UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

OCT 11 1995

4WD-RCRA

Ms. Jennifer R. Kaduck, Chief
Hazardous Waste Management Branch
Georgia Environmental Protection Division
205 Butler Street, S.E., Suite 1154
Atlanta, Georgia 30334

SUBJ: Comments on the RCRA Facility Assessment (RFA) Report
Hercules, Incorporated/Oxford, Georgia
EPA I.D. No. GAD 098 583 909

Dear Ms. Kaduck:

For the last few years, the Environmental Protection Agency's (EPA) overview of Georgia's implementation of the RCRA Program has focused more on HSWA activities rather than base program activities. With that in mind, the staff of Region 4's RCRA Permitting Section (FL/GA Unit) has initiated periodic oversight reviews of certain HSWA corrective action documents including RFAs, RFI NOTIs, and the HSWA portion of the State RCRA Permit. It is hoped that the comments and dialogue generated by these reviews have been helpful to the State, and it is with that in mind that the enclosed comments are submitted. These comments may be utilized now to make modifications to the Hercules RFA or in the future for use on other similar documents.

Enclosed are general and specific comments on the Hercules RFA Report. If you have any questions or would like to discuss the comments, feel free to contact Ms. Kim Clifton of my staff at (404) 347-3555 ext. 6320.

Sincerely,

G. Alan Farmer
Chief, RCRA Branch
Waste Management Division

Enclosure

Enforcement & Compliance History Online (ECHO)

Detailed Facility Report

Map Report Error Data Dictionary

For Public Release - Unrestricted Dissemination Report Generated on 06/25/2013
US Environmental Protection Agency - Office of Enforcement and Compliance Assurance

Gray text in this report indicates information that is not required to be reported to EPA. These data, typically regarding non-major or smaller facilities, are often incomplete.

Facility Permits and Identifiers

Data Dictionary

Statute	System	Source ID	Facility Name	Street Address	City	State	Zip
	FRS	110002316681	FIBERVISION INC	7101 ALCOVY ROAD NORTHEAST	COVINGTON	GA	30014
CAA	AFS	1321700020	FIBERVISIONS INCORPORATED	7101 ALCOVY RD	COVINGTON	GA	30014
RCRA	RCR	GAD098583909	FIBERVISIONS INC/OXFORD PLANT	7101 ALCOVY RD	COVINGTON	GA	30267
EP313	TRI	30209HRCLSALCOV	HERCULES INC.	7101 ALCOVY RD.	COVINGTON	GA	30209

Facility Characteristics

Data Dictionary

Statute	Source ID	Universe	Status	Areas	Permit Expiration Date	Latitude/ Longitude	Indian Country?	SIC Codes	NAICS Codes
	110002316681					LRT: 33.611510 , -83.849790	No		
CAA	1321700020	Major (Fed. Rep.)	Operating	TITLE V PERMITS , SIP , NSPS			NA	2824 2824	325222
RCRA	GAD098583909	SQG	Active (H)				No	2824	
EP313	30209HRCLSALCOV					33.6167 , -83.8583	NA	2824	325222

For the RCRA program, activities that contribute to an overall facility status of Active are displayed in parentheses using the acronym HPACS, where H indicates handler activities, P - permitting, A - corrective action, C - converter, and S - state-specific. More information is available in the Data Dictionary.

Inspection and Enforcement Summary Data

Data Dictionary

Statute	Source ID	Insp. Last 05Yrs	Date of Last Inspection	Formal Enf Act Last 05 Yrs	Penalties Last 05 Yrs
CAA	1321700020	3	05/14/2012	0	$00
RCRA	GAD098583909	0	12/12/1997	0	$00

RCRA FACILITY ASSESSMENT

OF

HERCULES INCORPORATED
OXFORD, GEORGIA

EPA ID. NO. GAD098583909

SUBMITTED BY:

LaVern Ajanaku
Environmental Engineer Principle
Georgia Department of Natural Resources
Environmental Protection Division
Hazardous Waste Management Branch
205 Butler Street, Suite 1162
Atlanta, Georgia 30334

June 1995

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

345 COURTLAND STREET, N.E.
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G. Alan Farmer
Chief, RCRA Branch
Waste Management Division

Enclosure

4WD-RCRA

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Hazardous Waste Management Branch
Georgia Environmental Protection Division
205 Butler Street, S.E., Suite 1154
Atlanta, Georgia 30334

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Sincerely,

G. Alan Farmer
Chief, RCRA Branch
Waste Management Division

Enclosure

K. Clifton/kc:4WD-RCRA:6320/10/2/95/HERCULES

CLIFTON 10-3-95 WILLIAMS 10/3/95 FARMER

COMMENTS ON THE HERCULES RFA REPORT
OXFORD, GEORGIA
EPA I.D. NO. GAD 098 583 909

GENERAL COMMENTS

1. The RFA Report should include SWMU Data Sheets. SWMU Data Sheets should include the following information: name of the unit, type of unit, period of operation, physical description and condition (including function and location), wastes and/or hazardous constituents managed, release pathways, history and/or evidence of releases, and recommendations.

2. A number of buildings, tanks, types of equipment are mentioned as being at the facility, yet the function of all these components is not clearly tied together. Perhaps, a process flow diagram would assist in piecing the details of this facility together (e.g., What is the purpose of the underground oil/water separator? How does it fit into the process? What unit or units did it serve? What did it store? With the limited information presented it is not possible to determine if it should have been identified as a SWMU).

SPECIFIC COMMENTS

1. Introduction (Page 1)

   Paragraph 1 introduces the RFA, but instead of identifying the objective of the RFA, which you would expect to follow this opening statement, the objective of the RCRA Program is stated.

   It may be helpful at this point to identify the stages of the RFA, such as: Preliminary File Review, Visual Site Investigation, Verification Sampling, and RFA Report.

2. (Page 2)

   a. Line 2 states, "The mechanism by which corrective action is specified includes the RFA, for which the present document is the final report."

      As part of the RFA, **preliminary determinations** are made regarding releases of concern and the need for further actions and interim measures or stabilization at the facility, corrective action is not specified here, but in the permit.

b. Line 4 states that the RCRA corrective action program for SWMUs consists of three phases. The highlighted words should be deleted.

c. Line 5 identifies the RFA phase of the RCRA corrective action program as follows:

The RCRA Facility Assessment (RFA) to identify releases or potential releases requiring further investigation.

A more accurate definition would be as follows: The RFA, to identify SWMU & AOCs and evaluate them for releases or potential releases to all media.

d. Line 7 identifies the purpose of the RFI phase being to fully characterize the extent of identified releases. This should say to fully characterize the **nature and** extent of identified releases.

e. Line 9 identifies the third phase as corrective measures selection and implementation, if required. **Should this say CMS study and implementation? To be consistent with the other two phases as identified above briefly describe this phase.**

3. Site Features (Page 4)

Paragraph 2 states that the Dowthern tanks are **self-contained.** Please explain what is meant by self-contained. Do you mean has secondary containment?

5. Regulatory History (Page 6)

The first paragraph states that Hercules was granted a permit on June 30, 1986. What type of permit was this? Was this a permit to store hazardous waste? Please be specific here.

6. RCRA Order (Page 6)

It states here that an Administrative Order was executed, briefly explain why the Administrative Order was executed.

7. CERCLA Activities (Page 7)

This paragraph states that Hercules is on the CERCLA list. What CERCLA list? Is this a State list or a Federal list? Please be more specific.

INDIVIDUAL SWMU ASSESSMENTS AND AOC DESCRIPTION

8. SWMU 1: Salt Pot Room (Page 8)

Describe the equipment contained in this room. Describe how the polymer is reclaimed. List the hazardous wastes and/or hazardous constituents managed here. Describe the present condition of the floor.

9. SWMU 2: Old Waste Oil Storage Area

This paragraph states that an inspection of this area was performed in 1985. When was this area first used? Within this paragraph, this area is described also as the "Waste Oil Drum Storage Area," so can EPA assume that waste oil was released or leaked from a number of drums stored in this area at some time during the operation of this facility? What are the dimensions of the area where drums were located and how large of an area was cleaned up? The waste oil that was stored in this area, where did it come from?

10. SWMU 3: Container Storage Building

a. The following information should be included, in addition to the information already stated in this paragraph: location of the unit, physical description and condition of the unit, specific hazardous wastes and/or hazardous constituents managed, release pathways, years of operation.

b. Paragraph 1 concludes with the statement that further investigation is needed in this area. If an RFI is recommended then this should be stated here.

11. SWMU 4: Number 6 Fuel Oil Storage Tank Area

See comment 10a and 10 b above.

12. SWMU 5: Present Waste Oil Storage Area

a. What were the dimensions of the pad?

b. See comment 10b.

13. Summary (Page 9)

a. The purpose of this report should be to identify SWMUs and/or AOCs and evaluate them for releases or potential releases to all media, to make preliminary determinations regarding releases of concern and the need for further actions and interim measures or stabilization at the facility, and to identify those SWMUs and/or AOCs that do

not pose a threat to human health or the environment at the time of the VSI.

b. Paragraph 2 states the following:

It has been determined that there are AOCs at the facility as a result of current and past operations. During the visual site inspection, there were five (5) SWMUs identified. Three (3) of those units will require further investigation, and two (2) will not.

No AOCs were identified anywhere in the RFA Report except as mentioned above. It appears that the author is using the acronym AOC in error. EPA defines an Area of Concern (AOC) as any area having a probable release of hazardous waste or hazardous constituents which is not from a solid waste management unit and is determined by the Regional Administrator to pose a current or potential threat to human health or the environment. The five units identified above are clearly SWMUs. EPD may want to revise this paragraph.

GA0177

HERCULES

Lank Langston

Hercules Incorporated
P. O. Box 8
Oxford, GA 30267
(404) 786-7011

RECEIVED EPA/REGION IV
MAR 9 2 11 PM '89
WASTE COMPLIANCE SECTION

February 10, 1989

Regional Administrator
Environmental Protection Agency Region IV
345 Courtland St., N.E.
Atlanta, GA 30365

RE: Soft Hammer Demonstration/Certification

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, Hercules Incorporated has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a)(2) for EPA waste code U211.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that recovery is the best practically available treatment.

The review of practically available treatment technologies included a consideration of 1) past treatment practices, 2) a cost ratio that compared the cost of treatment, shipment and disposed versus the cost of shipment and disposal, and finally 3) a treatment hierarchy that included recycling/recovery, destruction (incinerator) and immobilization (stabilization).

If any further information is required, please contact me at (404) 786-7011.

Patrick Kitchens

Patrick Kitchens

Enclosure

xc: B. Khaleghi - GA EPD
E. A. Ikenberry - 5160 N.W.
Chemical Waste Management, Inc.

5857F/1

SOFT HAMMER DEMONSTRATION

Waste Code U211

FACILITY OWNER	LOCATION	TREATMENT METHOD	TELEPHONE	CONTACT	DATE
1. Chemical Waste Management, Inc.	Emelle, AL	Recovery	(205) 652-9721	Carolyn Miller	02/09/89

HERCULES

Hercules Incorporated
P. O. Box 8
Oxford, GA 30267
(404) 786-7011

I CERTIFY UNDER PENALTY OF LAW THAT THE REQUIREMENTS OF 40 CFR 268.8(A)(1) HAVE BEEN MET AND THAT I HAVE CONTRACTED TO TREAT MY WASTE (OR WILL OTHERWISE PROVIDE TREATMENT) BY THE PRACTICALLY AVAILABLE TECHNOLOGY WHICH YIELDS THE GREATEST ENVIRONMENTAL BENEFIT, AS INDICATED IN MY DEMONSTRATION. I BELIEVE THAT THE INFORMATION SUBMITTED IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

PATRICK KITCHENS

PK/de
02/15/89
5866F

GA 0243

DL

GAD 078 583 909

HERCULES

Hercules Incorporated
P. O. Box 8
Oxford, GA [illegible]267
(404) 786-70[illegible]

RECEIVED
EPA/REGION IV
89 MAR 27 10:26 AM
WASTE
COMPLIANCE SECTION

March 29, 1989

Regional Administrator
Environmental Protection Agency Region IV
345 Courtland St., N.E.
Atlanta, GA 30365

RE: Revised Soft Hammer Demonstration/Certification

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, Hercules Incorporated has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a)(2) for EPA waste code U210.

This demonstration reflects the discovery that recovery is not a practically available treatment as was indicated in the February 10, 1989 demonstration submitted to you. Based on new information, incineration is the best practically available treatment.

The review of practically available treatment technologies included a consideration of 1) past treatment practices, 2) a cost ratio that compared the cost of treatment, shipment and disposed versus the cost of shipment and disposal, and finally 3) a treatment hierarchy that included recycling/recovery, destruction (incinerator) and immobilization (stabilization).

Please replace the previously submitted soft hammer demonstration and certification with this revision.

If any further information is required, please contact me at (404) 786-7011.

Patrick Kitchens

Enclosure

xc: B. Khaleghi - GA EPD
E. A. Ikenberry - 5160 N.W.
Chemical Waste Management, Inc.

5857F/3

SOFT HAMMER DEMONSTRATION

Waste Code U210

FACILITY OWNER	LOCATION	TREATMENT METHOD	TELEPHONE	CONTACT	DATE
1. Chemical Waste Management, Inc.	Emelle, AL	Incineration	(205) 652-9721	Susan Stokes	03/29/89
2. Trade Waste Incineration	Sauget, IL	Incineration	(618) 271-2804	Terry Johnson	03/31/89
3. CWM Resource Recovery, Inc.	West Carrollton, OH	Incineration	(513) 859-6101	Tony Rose	03/31/89

REV. 3/31/89

5857F/4

HERCULES

Hercules Incorporated
P. O. Box 8
Oxford, GA 30267
(404) 786-7011

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Patrick Kitchens

PATRICK KITCHENS

PK/de
02/15/89
5866F

GA0179

HERCULES

Hercules Incorporated
P. O. Box 8
Oxford, GA 30267
(404) 786-7011

February 10, 1989

Regional Administrator
Environmental Protection Agency Region IV
345 Courtland St., N.E.
Atlanta, GA 30365

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The review of practically available treatment technologies included a consideration of 1) past treatment practices, 2) a cost ratio that compared the cost of treatment, shipment and disposed versus the cost of shipment and disposal, and finally 3) a treatment hierarchy that included recycling/recovery, destruction (incinerator) and immobilization (stabilization).

If any further information is required, please contact me at (404) 786-7011.

Patrick Kitchens

Enclosure

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E. A. Ikenberry - 5160 N.W.
Chemical Waste Management, Inc.

5857F/2

SOFT HAMMER DEMONSTRATION

Waste Code U210

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1. Chemical Waste Management, Inc.	Emelle, AL	Recovery	(205) 652-9721	Carolyn Miller	02/09/89

HERCULES

Hercules Incorporated
P. O. Box 8
Oxford, GA 30267
(404) 786-7011

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PATRICK KITCHENS

PK/de
02/15/89
5866F

TABLE OF CONTENTS

I. EXECUTIVE SUMMARY

A Visual Site Inspection (VSI) was performed at Hercules, Incorporated (Hercules) on May 10, 1995 by Georgia Environmental Protection Division (EPD) inspector LaVern Ajanaku and on May 15, 1995 by LaVern Ajanaku and Steve White. The inspectors were accompanied by Cynthia R. Nowak and P. Kitchens, employees of Hercules, during the inspection.

Hercules is a facility which manufactures synthetic fiber - continuous filament, bulked continuous filament, and staple - from polypropylene polymer which is produced at other off-site locations. The facility is located in Newton County within the city of limits of Covington, Georgia which is adjacent to the city of Oxford, Georgia. Hercules presently operates one (1) hazardous waste management area, the Container Storage Building.

During the facility file search, information contained in this report was retrieved from EPD and EPA files.

II. INTRODUCTION

The RCRA Facility Assessment (RFA) is a preliminary phase of the RCRA corrective action program. The objective of the program is to clean up releases to the environment of hazardous waste or hazardous constituents. The program applies to all operating, inactive, or closed facilities that treat, store, or dispose of hazardous waste (TSDs) and which thereby are required to obtain RCRA permits.

Prior to the passage of the 1984 Hazardous and Solid Waste Amendments to RCRA, the Georgia Environmental Protection Division's authority to require corrective action for releases of hazardous constituents was limited to releases to groundwater from units that were covered by RCRA permits. Paragraph 391-3-11-.10(2) of the Georgia Rules for Hazardous Waste Management, which incorporates 40 CFR 264 Subpart F, provided the vehicle for requiring corrective action at these "regulated" units. Subsequent to state authorization for the 1984 amendments. EPD's program now extends to releases of hazardous constituents to any media from all units at TSDs. "Unit" in the present context implies "solid waste management unit" (SWMU), the definition of which includes, but is not limited to, any landfill, surface impoundment, waste pile, land treatment unit, incinerator, injection well, tank (including storage, treatment and accumulation tanks), container storage unit, wastewater treatment unit, including all conveyances and appurtenances used in waste management or stormwater handling, elementary neutralization unit, transfer station, or recycling unit from which hazardous waste, or hazardous constituents might migrate, irrespective of whether the units were intended for the management of solid and/or hazardous waste. The term also applies to areas associated with production processes which have become contaminated as a result of routine, systematic and deliberate releases of wastes or constituents. Atmospheric releases that are covered by an operating permit under Georgia's Air Quality Control Act are excluded. The Georgia Rules for Hazardous Waste Management have been amended by adopting 40 CFR 264.101 which, in part, states that corrective action for releases from SWMUs will be specified in the RCRA permit. The Georgia Hazardous Waste Management Act, O.C.G.A. 12-8-60 et seq., independently specifies that any permit "shall contain conditions requiring

constituents at the facility seeking a permit, regardless of the time at which waste was placed at such facility" [12-8-66(e)]. The mechanism by which corrective action is specified includes the RFA, for which the present document is the final report.

The RCRA corrective action program for SWMUs consists of three phases:

1. The RCRA Facility Assessment (RFA) to identify releases or potential releases requiring further investigation.

2. The RCRA Facility Investigation (RFI) to fully characterize the extent of identified releases.

3. If required, corrective measures selection and implementation.

During the RFA, EPD investigators compile information on SWMUs and other areas of concern at the facility. Sources of information include inspection reports, permit applications, historical monitoring data, interviews, and aerial photographs. As of June 28, 1988, Paragraph 391-3-11(3)(g) of the Georgia Rules [40 CFR 270.14(d)] requires that a permit applicant itself provide descriptive information on the SWMUs and provide all available information pertaining to any release from the units. EPD evaluates this information to screen from further investigation or action those SWMUs which do not pose a threat to human health or the environment, and to make preliminary determinations regarding releases from the remaining SWMUs, i.e., whether interim corrective measures and/or further investigations are needed. These "further investigations" are handled under the RCRA Facility Investigation (RFI) phase of the program. (RFA, 1991)

A. File Search and VSI

A file search was done before performing the visual site inspection. The sources used include facility files located at the EPD/Hazardous Waste Management Branch office and facility file located at the EPA office.

A Visual Site Inspection was conducted on May 10, 1995 and May 15, 1995. All areas which currently or in the past could have involved a release of hazardous wastes or hazardous constituents to the environment were investigated. See Figure 1 for the location of these areas. Those areas include the following:

- Salt Pot Room

- Old Waste Oil Storage Area

- Container Storage Building

- Number 6 Fuel Oil Storage Tank Area

- Present Waste Oil Storage Area

B. Facility Description

B.1 Site Location

The Oxford, Georgia Hercules, Inc. facility is located on Alcovy Road in Newton County within the city limits of Covington, Georgia which is adjacent to the city of Oxford, Georgia. The facility mailing address is:

Hercules, Incorporated
P. O. Box 8
Oxford, Georgia 30267

The latitude and longitude of the site is 33°37'00" and 83°51'30" respectively.

B.2 Nature of Operations

Hercules is a facility which manufactures polypropylene fiber in continuous filament, bulked continuous filament, and staple form. The polypropylene fiber is used for carpet fiber, and in staple form it is used as an absorbent fiber in disposable diapers. Hercules ceased manufacture of carpet fiber in February of 1992. All hazardous waste generated at the site is eventually shipped off-site to other permitted hazardous waste treatment or disposal facilities.

B.3 Site Features

Hercules presently operates one hazardous waste management unit, the permitted Container Storage Building. The location of this unit is identified on the Facility Site Map in Figure 1.

The Hercules property encompasses approximately 150 acres. See Figure 5 for an aerial photograph taken August 11, 1984. The facility has a main gate which is located on Alcovy Road and is used for receiving deliveries by truck, making shipments by truck, entrance for contractor vehicles, and entrance for contractor and Hercules employees. The other closed and locked gates can accommodate movement of vehicles and equipment during heavy construction or during emergencies, if necessary. The facility has several storage buildings on site. North of Plant I is a 750,000 gallon fire pond. This is a reservoir which will be used in the event of an emergency on-site (See Photo 1). The facility uses carp fish to keep the lined pond free of algae. Storage buildings which house facility equipment, a Rainwater Flotation Basin, the Boiler House which houses the boilers to furnish energy for the plant and two (2) contained fuel oil storage tanks are also located north of Plant I. In one of the storage buildings, the facility stores material and chemicals for roofing. The building is totally contained. It has a concrete floor with no floor drains or outlet valves (See Photo 2). On the south end of Plant I is a maintenance shop which has a satellite accumulation area which stores used rags, aerosol cans, used batteries and used oil (See Photos 5 - 8). Also, near this area is an underground oil-water separator. The tank is 250 gallons in size and has been in place since 1989 (See Photo 10). South of Plant I are the contained Dowtherm J storage tanks, a cooling tower, the Salt Pot Room, the permitted Container Storage Building, Staple Plant II, the Process

Water Outfall, a Rainwater Flotation Basin, railroad tracks for rail cars which transport the polypropylene flakes (See Photos 3 & 4), and silos for storage of the polypropylene.

The Dowtherm tanks are self contained (See Photo 10a). See Table 1 for a description of Dowtherm J and its uses. The facility bleeds the tanks once or twice a year. The waste is accumulated in drums labeled with the D001 EPA hazardous waste code. When a 55-gallon drum is filled, it is transferred to the Container Storage Building. The containment has two (2) drains and (2) locked valves which would be used to remove waste in the event of a release (See Photos 11 & 12). See Section D for details of the Container Storage Building.

The Salt Pot Room is used to wash the spinnerettes in salt baths. The salt baths are contained in 50-gallon tanks. D001 (High-tec) was used in the salt baths (See Photos 13 & 14). The facility has discontinued the use of High-tec and is now using a non-hazardous product named 290 Parkettes. High-tec was used for several years in the salt baths. The floor drains in this area drain to the POTW (See Photo 15).

The Process Water Outfall (POTW) has been built for two (2) years (See Photo 16). Prior to its installation, the facility used a lift station to pump water to sewer system. The facility presently generates approximately 200,000 gallons of process water a day. The facility samples the water at the POTW once a month as required by the city. They also sample every six (6) months for extensive testing. See Exhibit D for the results of the analysis of those samples taken from the extensive testing.

There are two (2) Rainwater Flotation Basins used to catch rain water run-off from the facility (See Photos 17 - 19). The basins are cleaned out approximately once every two (2) years. The settlement is sent to a landfill.

One of the fuel oil storage tanks is a primary tank and is used to store and transfer Number 6 fuel oil (See Photo 20). Its capacity is approximately 257,000 gallons and its dimensions are 37' dia. x 31'-8" high. It is also enclosed in a diked area with a concrete floor to contain spills and a drainage valve which is kept locked. The dike dimensions are 89' square and the dike itself is 3.87' high, with a volume of 230,000 gallons. The tank level is reportedly kept below 230,000 gallons. The diked area has a drain valve to remove rain water accumulation and to remove small spills or leaks from storage tank or remnants of large spills. The tank truck unloading facility for this storage tank is equipped with a diked area or sump that will contain the capacity of a tank truck in case of a spill or leak during unloading, etc. Valves are provided to drain off rain water accumulation and to collect spilled fuel oil. The second fuel oil storage tank is approximately 500 gallons and is in a diked area with a concrete floor to contain spills and a drainage valve which is kept locked (See Photo 21).

There were four underground storage tanks at the facility. See Figure 1 for the location of these tanks. Each tank is approximately 24,000 gallons in size. Two tanks contain the product fiber finish. The third tank is empty. The fourth tank, which held Number 2 fuel oil, was excavated one year ago. It was located north of Plant I near the Power House.

There are laboratories located in Plant I and II. Only three of the eleven laboratories located at the facility generate hazardous waste. Those are the Chromatography, Textile, and Spinning laboratories. After accumulation, the waste is reportedly transported to the Container Storage Building for storage until shipped offsite.

C. Process Description

The polypropylene in flake form is piped from railcars into silos from there it is sent to either the spin tower in Plant I to produce filament form fiber or to Plant II to produce staple form fiber. Photo 31 shows the piping which carries the polypropylene into Plant I from the silos. As the polypropylene travels from top to bottom of the spin tower it is mixed with colorants and stabilizers, blended, heated by way of extruders and put through spinnerettes. At this point, it is spun onto spools. The hazardous wastes generated are not produced by the manufacturing process, but are commercial products which are used for equipment cleaning, laboratory operations or support operations. See Table I for the process descriptions of the generation of hazardous waste.

D. Waste Management Practices

D.1 Container Storage Building

The Container Storage Building was built in 1985 (See Photos 22 & 23). This area is presently used as the hazardous waste container storage area. It is located south of Plant I. It is currently permitted to receive and store all containers of hazardous waste generated by Hercules. The west end of the building, approximately 18' x 39', is restricted to hazardous waste container storage. The east end of the building is for storage of used oil, raw materials, and used Dowtherm J. Reportedly, the 6" reinforced concrete base underlying the container pallets is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed. The base is sloped approximately 1/4 inch per foot toward a grate covered drain trench near the center of the building (See Photo 23). Liquids resulting from leaks, spills or precipitation can be drained and collected at a locked 3" drain valve located outside the building foundation (See Photo 24). A secondary containment basin (approximately 10' x 5') is located inside the main containment basin and is also sloped for drainage and equipped with a locked 1" drain valve located outside the building foundation (See Photo 24). All hazardous waste liquids collected resulting from spills or leaks would be returned to non-leaking drums and placed in the hazardous waste storage area of the Container Storage Building. All containers - normally 55-gallons drums - are placed on wood pallets which provide additional protection against contact of the containers with accumulated liquids. Location for specific wastes within the storage area are designated by signs.

Run-on into the containment basins from surface waters is prevented by the elevation of the basins above grade which averages about 10 inches around all sides. The earth around the building is graded on all sides to provide rainwater drainage away from the building. The loading dock road bed is 4 feet below floor level and the fork lift truck approach ramp is 25 feet long inclined away from the building at an angle of 3°49'. A sheet metal roof and siding will prevent rainwater from entering the storage facility. The

containment basins are reportedly 46.7 feet above the 100-year flood plain of Dried Indian Creek.

Spilled or leaked liquid waste or accumulated precipitation is collected from the main containment basin and drain trench using the 3" drain valve, and at the secondary containment basin 1" drain valve to prevent overflow. Since the physical and chemical characteristics of the hazardous wastes stored in these basins are reportedly known before storage (odor, acidity, specific gravity, water solubility, etc.), any leaks or spills detected in the basins can be determined either by inspection or by tests. If the presence of any hazardous waste is indicated, it is reportedly collected at the respective drain valve, drummed and returned to the containment basin. The basin drain valves are high enough above grade to permit gravity flow collection of liquids from the basins into suitable containers for return to the storage area. The storage area is reportedly routinely inspected at least weekly. Inspection results are to be recorded and kept on file for at least 3 years. Operations personnel are required to be in the building frequently to obtain materials for the plant manufacturing processes. A leak or spill would be reported by them if detected by odor or otherwise. The building has six floodlights, turned on automatically by light detectors, for use by operations personnel getting materials from the non-hazardous storage section. A fire alarm station and weather protected telephone are located about 25 ft. from the entrance to the drum storage building.

All wastes normally generated and stored at this facility are reportedly either free liquids or dry solids. The only occasion when a sludge consistency waste might be generated would be from the clean-up of a liquid spill, leak or other abnormal occurrence. This material is reportedly stored in containers and absorbent material added to ensure that all free liquid is absorbed. In the event that a sludge is generated and stored in containers, in lieu of testing, a 5-inch freeboard space would be left at the top of the containers before sealing and transporting to storage. Prior to transportation off plant, the containers are reportedly opened and visually inspected for the presence of free liquids. If present, absorbent material should be added and the drum resealed for transport. This freeboard allowance also permits the disposer, at his facility upon receipt of the containers, to inspect and add absorbent without additional handling of the waste.

E. Regulatory History

E.1 RCRA Permitting History

Hercules opened for business in October of 1967. The facility was granted a permit on June 30, 1986 (See Exhibit A). The facility's existing hazardous waste facility permit number is HW-028(S). This permit expires June 30, 1996.

The facility contact is Mr. Patrick R. Kitchens, Environmental Coordinator. Mr. Kitchens can be reach at (404) 786-7011, Ext. 3220.

i. RCRA Orders

Administrative Order Number EPD-HW-142 was executed July 3, 1984 (See Exhibit B).

E.2. CERCLA Activities

Hercules is on the CERCLA list. A Preliminary Assessment was performed there on September 17, 1985 after which no further action was required.

E.3. Air Quality Permitting

Hercules currently holds permit numbers 2824-107-9506 and 2824-107-8122-0.

F. Release History

The release history for this facility has been included in the text which discusses each SWMU.

G. Environmental Setting

G.1. Land Use

The vast majority of the area within 1000 feet of the facility is zoned for residential, commercial, and industrial use (See Figure 2).

G.2. Water Supply

A survey was performed around the property boundary of Hercules by Newton County Health Department[2]. It appeared that most of the area around Hercules is served by city or county water (See Exhibit C).

Hercules operates no injection wells either on-site or off-site. Hercules has six (6) withdrawal wells on-site. See Section G.4 for more information on wells.

G.3. Surface Water

A Topographic map[3,4], Figure 2 shows the facility property boundaries (marked with the symbols "P") and a region 1,000 feet beyond showing land usage. Two-foot contour intervals are used to indicate direction of surface water flow. The only continuous flow surface water within the 1,000-foot region is Dried Indian Creek.

i. Flooding

A flood plain map is presented in Figure 4.[5] The flood plain map is taken from Federal Emergency Management Agency National Insurance Program - Flood Insurance Rate Map; Community Panel Number 130144-0002. It's effective date is March 2, 1983. Figure 4 shows that the permitted Container Storage Building is not in the limits of the 100 year flood area.

G.4. Groundwater

Hercules currently has six (6) withdrawal wells on site (See Photos 25-29). See Figure 6 for the location of wells. Three of the wells have been capped and are not in use. The three remaining wells are used to provide water to the Fire Pond, the manufacturing processes, the boilers, and the cooling towers. The wells were installed in 1986.

III. INDIVIDUAL SWMU ASSESSMENTS AND AOC DESCRIPTION

The following Solid Waste Management Units (SWMUs) were identified through the file review of the facility and the visual site inspection. Emergency Response had no reports of spills[6]. See Figure 1 for the location of these areas:

SWMU #1: Salt Pot Room

When the plant opened in 1967, this room was used to reclaim polymer. There were no hazardous constituents generated from this process. In approximately 1975, this room was used for salt baths for cleaning spinnerettes (See Photos 13 -15). See Section B.3 for details of operations in this unit. During an inspection on December 4, 1992, it was determined that sulfuric acid had been released onto the floor (See Exhibit G for Notice of Violation). During the repair of the floor it was noticed by the facility that in one of the floor drains, the nitric acid had deteriorated the concrete and was released into the soil (See Photo 15). Exhibit H provides the details of the remediation of that release and verifies that all contaminated soil was removed. No further investigations are needed in this area.

SWMU #2: Old Waste Oil Storage Area

During an inspection on June 28, 1985, it was noted that there was obvious contamination of the soil by waste oil around this area. The facility took samples of the contaminated soil and sent the samples to Chemical Waste Management (CWM) for analysis. The contaminated soil around the facility's Old Waste Oil Drum Storage Area was cleaned-up. It was transported as non-hazardous waste. Please see Exhibit I for details. No further investigations are needed in this area. The area is presently covered with asphalt.

SWMU #3: Container Storage Building

A hazardous waste spill was reported to EPD emergency response center on March 20, 1989. The spill was discovered during the facility's weekly inspection of the hazardous waste storage area. The contents of one drum (55 gallons) of Waste Big Dipper (See Table 1 for constituents) had leaked out and was contained in both the drum pallet and floor sump. The valves located on the outside of the west end of the building were used to drain the waste from the floor sump into containers (See Photo 24). This operation posed a high possibility for a release. Further investigation is needed in this area.

The west end of the covered container storage area is restricted to hazardous waste storage. A concrete curb forms a secondary containment basin. At the time of an inspection on June 12, 1991, there appeared to be surfacial cracks in the base (See

Exhibit E). On August 9, 1991, the base was repaired, a new coating was applied (See Exhibit F).

SWMU #4: Number 6 Fuel Oil Storage Tank Area

A fuel oil spill was discovered on September 5, 1981 by the utility operator. During the inspection, the operator discovered the fuel oil pump had burst a shaft mechanical seal. This resulted in approximately 3,000 gallons of #6 fuel oil being dumped inside the diked area. This diked area had an earthen bottom. The fuel oil soaked into the soil. The contaminated soil was removed, and dumped at the Newton County Landfill. See Exhibit J for more details. This area needs further investigation. There were no samples taken at the time of the spill to ensure that all the contaminated soil was removed. After this incident, the facility installed a concrete bottom to the diked area.

SWMU #5: Present Waste Oil Storage Area

The pad used to store waste oil was constructed in 1985. It is located northeast of the Container Storage Building (See Photo 30). The pad appeared to have numerous cracks. It is used to store containers of used waste oil, empty drums, and a non-hazardous waste condensate generated in the manufacturing process of the polypropylene. Any run-off from this pad drains to the northwest corner and runs through a drainage ditch which goes underneath an access road in back of the facility. From there the run-off flows onto the property in back of the plant. Photos 17 and 22 also provides views of this storage pad. Further investigation is needed in this area.

IV. SUMMARY

The purpose of this report is to identify SWMUs which require further investigation and to determine whether corrective action is necessary.

It has been determined that there are AOCs at the facility as a result of current and past operations. During the visual site inspection, there were five (5) SWMUs identified. Three (3) of those units will require further investigation, and two (2) will not.

This report stipulates that a RCRA facility investigation will be required for the facility. That information will be incorporated into the Permit.

REFERENCES

1. Hercules, Incorporated, Part B Application, Permit No. EPD-HW-028(S), and facility files.

2. Newton County Health Department, 5220 Highway 278, Covington, Georgia, 30209, June 11, 1985.

3. Southern Resource Mapping Corporation, Ormond Beach, Florida, November 1985.

4. U.S. Geological Survey, 7.5-Minute Topographic Covington Quadrangle Map of Georgia.

5. Flood Insurance Rate Map, City of Covington, Georgia, Newton County, prepared by the Federal Emergency Management Agency, March 2, 1983.

6. Emergency Response and Removal Branch, Helen Scott, EPA, Courtland Street, Atlanta, Georgia, Records Start From 1988 - Present.

7. Underground Storage Tanks, Land Protection Branch, Shaheer Mahana, Tradeport, Atlanta, Georgia.

EXHIBIT A

FACILITY PERMIT

Georgia Department of Natural Resources
205 Butler Street, S.E., Floyd Towers East, Atlanta, Georgia 30334
J. Leonard Ledbetter, Commissioner
Harold F. Reheis, Assistant Director
Environmental Protection Division
(404) 656-[illegible]3

June 30, 1986

FILE COPY
#12

Mr. Ned E. Downs
Environmental Coordinator
Hercules, Inc.
P. O. Box 8
Oxford, Georgia 30267

Re: Hazardous Waste Permit for
Hercules Incorporated
Storage Facility

Dear Mr. Downs:

Enclosed is hazardous waste storage permit number HW-028(S) issued to the Hercules Incorporated, Oxford, Georgia facility. This permit becomes final thirty (30) days after the date of issuance.

The permit contains specific operating and monitoring requirements which must be met. Attached to the permit is a copy of the Georgia Rules for Hazardous Waste Management, which will be applicable during the ten (10) year life of the permit.

Should you have any questions concerning this permit, please contact Mr. Behrooz Khaleghi at 404/656-7802.

Sincerely,

J. Leonard Ledbetter

J. Leonard Ledbetter
Commissioner

JLL:bkw

cc: James Scarbrough, U.S. EPA

State of Georgia

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

HAZARDOUS WASTE FACILITY PERMIT

Permit No. HW-028(S) **Facility I.D. No.** GAD098583909

In accordance with the provisions of the Georgia Hazardous Waste Management Act and the Rules, Chapter 391-3-11, (as amended through September 25, 1985), adopted pursuant to that Act,

Hercules Incorporated Oxford Georgia plant

is issued a Permit for the following:

Storage of a maximum of 5720 gallons of hazardous waste in drums.

at the following location:

Alcovy Road
Covington, Georgia 30209

This Permit is conditioned upon compliance with all provisions of the Georgia Hazardous Waste Management Act, the Rules, Chapter 391-3-11 (as amended through September 25, 1985) adopted pursuant to that Act, and any other condition of this Permit.

This Permit is subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in the application(s) dated 12-12-85 supporting data entered therein or attached thereto, or any subsequent submittals or supporting data; or for failure to disclose fully all relevant facts; or when the facility poses a threat to the environment or the health of humans.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached nine page(s), which page(s) are a part of this Permit.

Permit Issuance Date: June 30, 1986
Permit Termination Date: June 30, 1996

J. Leonard Ledbetter
Director
Environmental Protection Division

Permit Number: HW-028(S)
Hercules, Inc., Oxford Plant

Hercules Incorporated, Oxford Georgia Plant, GAD098583909, is hereinafter referred to as the Permittee.

SECTION I. General Permit Conditions

A. Scope and Effect of Permit

1. The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any hazardous waste treatment, storage or disposal not authorized in this permit is prohibited. The Permittee must comply with the Georgia Hazardous Waste Management Act and the Rules for Hazardous Waste Management, Chapter 391-3-11, which Rules include certain portions of the Federal Hazardous Waste Regulations (found at 40 CFR Parts 260-264, 270 and 124). Where a citation to the Federal Regulations is made in this permit, it refers to the specific regulations adopted by EPD.

2. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

3. Compliance with this permit does not constitute a defense to any action brought by the Director under Section 18, Emergency Powers, of the Georgia Hazardous Waste Management Act, O.C.G.A. § 12-8-75, as amended.

4. Nothing in this permit shall be construed to preclude the institution of any legal action under Section 3008 of the Federal Resource Conservation and Recovery Act or under Sections 7 and 17 of the Georgia Hazardous Waste Management Act, O.C.G.A. §§ 12-8-81 - 12-8-82, as amended.

5. This permit may be modified, revoked and reissued, or terminated for cause as specified in Rule 391-3-11.11(6)(b) and (c) and §§270.41, 270.42 and 270.43. The filing of a request for a permit modification, variation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability of any permit condition.

6. The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

7. This permit is issued following certification by the Permittee (copy attached hereto and incorporated into this permit) that appropriate corrective action for all releases of hazardous wastes or constituents from solid waste management units has already been

taken and that there are no releases requiring further action as described in §12-8-66 of the Georgia Hazardous Waste Management Act, as amended, and Section 3004(u) of RCRA, as amended in 1984. Since there are no other sections of the 1984 amendments to RCRA which affect this facility, this permit constitutes the RCRA permit required by the Georgia EPD and the U.S. EPA.

B. Management Requirements

1. The Permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted facility or of any planned changes in the process generating the hazardous waste which changes might affect the performance of the permitted facility.

2. The Permittee shall maintain at the facility until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

   (a) Complete copy of this permit and permit application
   (b) Waste Analysis Plan
   (c) Personnel training documents and records
   (d) Contingency plan
   (e) Closure plan
   (f) Cost estimate for facility closure and closure assurance instrument
   (g) Demonstration of liability coverage as required in 264.147
   (h) Operating record
   (i) Inspection schedule log

3. All amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Director for approval and permit modification as necessary.

4. When the Permittee becomes aware that the Permittee failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or on any report to the Director, the Permittee shall promptly submit such facts or information.

5. The Permittee shall at all times properly operate and maintain all facilities which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of a back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of this permit.

C. Monitoring and Reporting

1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in the most recent editions of Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW 846; or Standard Methods for the Examination of Water and Wastewater; (or an equivalent method as specified in the Waste Analysis Plan).

2. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods are automatically extended during the course of any unresolved enforcement action regarding this facility and also may be extended at any time at the Director's discretion.

3. Records of monitoring information shall include:

   (a) The date, exact place and time of sampling or measurements
   (b) The individual(s) who performed the sampling
   (c) The date(s) analyses were performed
   (d) The individual(s) who performed the analyses
   (e) The analytical techniques or methods used; the method of sample preservation; and quality assurance methods
   (f) The results of such analyses.

4. The Permittee shall report to the Director or his representative orally within 1 hour from the time the Permittee becomes aware of any circumstances resulting from the operation of the hazardous waste management facility (including periods of noncompliance) which may endanger health or the environment, including but not limited to:

   (a) Release of any hazardous waste that may cause an endangerment to public drinking water supplies.

   (b) Release or discharge of hazardous waste or a fire or explosion which could threaten human health or the environment outside the facility.

   The description of the occurrence shall include:

   (i) Name, address and telephone number of the owner or operator;

(ii) Name, address and telephone number of the facility;
(iii) Date, time and type of incident;
(iv) Name and quantity of materials involved;
(v) The extent of injuries, if any;
(vi) An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and
(vii) Estimated quantity and disposition of recovered material that resulted from the incident.

5. Within fifteen days of becoming aware of any reportable incident as in C-4 above which may endanger health or the environment, the Permittee shall submit a written report of the incident covering the following:

(a) Description of occurrence as in C-4 above
(b) Cause of occurrence
(c) Period of occurrence, including exact dates and times
(d) Time occurrence expected to continue (if not already corrected)
(e) Steps taken or planned to reduce, eliminate, and prevent recurrence.

6. The Permittee shall report instances of non-compliance, other than those described in condition C-4, semi-annually on July 15 (covering January 1-June 30) and January 15 (covering July 1-December 31). The report shall cover the information requested in condition C-5 for each incident.

7. All reports or other information requested by the Director shall be signed and certified according to the requirements in 270.11.

D. Responsibilities

1. Right of Entry. The Permittee shall allow the Director of EPD, the Regional Administrator of EPA, and/or their authorized representatives, agents, or employees, upon the presentation of credentials and other documents as may be required by law to:

(a) Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

(d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Georgia Hazardous Waste Management Act, any substances or parameters at any location.

2. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to §270.41(b)(2) or §270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.

3. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such non-compliance is authorized by an emergency permit. Any non-compliance with this permit constitutes a violation of the Georgia Hazardous Waste Management Act and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or for denial of a permit renewal application.

4. Duty to Reapply. If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must submit a complete application for a new permit at least 180 days before this permit expires.

5. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

6. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from non-compliance with this permit.

7. Duty to Provide Information. The Permittee shall furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The Permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.

8. Anticipated Non-Compliance. The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in non-compliance with permit requirements.

E. Conditions Related to Compliance with General Facility Standards (40 CFR Part 264 Subparts B, C, D, E, G, H)

1. The Permittee must follow the procedures and plans described in detail in the permit application dated December 12, 1985 as amended, which are hereby incorporated by reference and include at least the following:

   - Waste Analysis Plan, Section C-2
   - Contingency Plan, Section G
   - Inspection Schedule, Section F-2
   - Closure Plan, Section I
   - Training Program, Section H

2. The following activities must be carried out as prescribed in 40 CFR Part 264 Subparts B, C, D, and E.

   - Required notice - 264.12(a) and (b)
   - Security - 264.14(b) and (c)
   - Repairs and Inspection Log - 264.15 (c) and (d)
   - Annual review of training - 264.16(c)
   - Design and Operation - 264.31
   - Access to communications or alarm system - 264.34
   - Testing and Maintenance of Equipment - 264.33
   - Maintain aisle space - 264.35
   - Arrangements with local authorities - 264.37
   - Amendment of Contingency Plan - 264.54
   - Operating Record - 264.73 and Disposition of Records - 264.74
   - Reports - 264.75 and 264.77

3. The Permittee shall be required to certify no less often than annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment in accordance with 40 CFR §264.73(b)(9).

4. The following activities must be carried out as prescribed in 40 CFR Part 264 Subparts G and H.

   - Closure in accordance with approved Plan - 264.113
   - Amendment of Closure Plan and Notification of Closure - 264.112 (b) and (c)
   - Disposal or decontamination of equipment - 264.114
   - Certification of Closure - 264.115
   - Revision of cost estimate - 264.142
   - Financial Assurance for Closure. Continuous compliance with 264.143 must be maintained by the Permittee for the amount of the cost estimate for closure as revised by §264.142 until released by the Director as provided in §264.143(i).

5. The Permittee must maintain sudden liability coverage of $1,000,000 for each occurrence and $2,000,000 annual aggregate until certifications of closure as specified in §264.115 are received by the Director. Liability coverage must be in effect before the Permittee is authorized to manage hazardous waste under this permit. The Permittee must carry out the activities as specified in §264.147.

6. The Permittee must comply with §264.148 whenever necessary.

Section II. Storage in Containers

A. General: The conditions in this module only apply to the following storage areas and/or units: Container storage area. Storage is expressly limited to those areas delineated in the scale drawing of the facility found in Figures B-1 and D-1 of the application.

B. Conditions Related Solely to Storage in Containers

1. Only those hazardous wastes listed in the Part A permit application dated April 4, 1986 may be stored in the permitted area.

2. Ignitable wastes may be stored only in that portion of the permitted area which is a minimum of fifty (50) feet from the nearest facility boundary.

3. The Permittee is authorized to store 5720 gallons of hazardous waste in containers.

4. If a container holding hazardous waste is not in good condition, or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition.

5. Containers must be managed according to §264.173.

6. Spilled or leaked waste and accumulated precipitation must be managed per §264.175(b)(5).

7. Incompatible wastes in the permitted area must be segregated properly.

INFORMATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Hercules Incorporated

EPA I. D. NUMBER: GAD 098583909

LOCATION City - P. O. Box 8 Oxford

State Georgia

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART B APPLICATION

	YES	NO
• Landfill	___	X
• Surface Impoundment	___	X
• Land Farm	___	X
• Waste Pile	___	X
• Incinerator	___	X
• Storage Tank (Above Ground)	___	X
• Storage Tank (Underground)	___	X
• Container Storage Area	___	X
• Injection Wells	___	X
• Wastewater Treatment Units	___	X
• Transfer Stations	___	X
• Waste Recycling Operations	___	X

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed each unit. In particular please focus on whether or not the wastes would considered as hazardous wastes or hazardous constituents under RCRA. Als include any available data on quantities or volumes of wastes disposed of the dates of disposal. Please also provide a description of each unit an include capacity, dimensions, location at facility, provide a site plan i available.

Not applicable

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste unit your Part B application, please describe for each unit any data available any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information

a. Date of release
b. Type of waste released
c. Quantity or volume of waste released
d. Describe nature of release (i.e., spill, overflow, ruptured pipe or etc)

No releases have ever occurred.

4. In regard to the prior releases described in Number 3 above, please provi (for each unit) any analytical data that may be available which would des the nature and extent of environmental contamination that exists as a res such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

Not applicable

Signature and Certification

As with reports in RCRA Permit Applications, submittal of this information mus contain the following certification and signature by a principal executive off of at least the level of Vice President or by a duly authorized representative that person:

I certify under penalty of law that I have personally examined and am fami with the information submitted in this document and all attachments and th based on my inquiry of those individuals immediately responsible for obtai the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

W. J. FISHER, JR., PLANT MANAGER

Signature

Name and Title (Typed)

EXHIBIT B

ADMINISTRATIVE ORDER NO. EPD-HW-142

ENVIRONMENTAL PROTECTION DIVISION
DEPARTMENT OF NATURAL RESOURCES
STATE OF GEORGIA

IN RE: HERCULES-OXFORD PLANT
POST OFFICE BOX 8
OXFORD, GEORGIA 30267

Order No. EPD-HW-142

ADMINISTRATIVE ORDER

WHEREAS, Hercules-Oxford Plant (hereinafter the "Respondent") presently operates a hazardous waste treatment, storage or disposal facility subject to the permitting requirements of the Georgia Hazardous Waste Management Act O.C.G.A. §12-8-60 et seq. (hereinafter the "Act"); and

WHEREAS, the Act provides in O.C.G.A. §12-8-66(a) et seq. that it is unlawful to operate a hazardous waste treatment, storage or disposal facility without first obtaining and possessing a hazardous waste facility permit from the Director of the Environmental Protection Division (hereinafter the "EPD"); and

WHEREAS, the Act at O.C.G.A. §12-8-69 authorizes the Director to grant variances in accordance with the provisions of the Act provided such variances are not inconsistent with the Federal Act and the rules promulgated thereunder; and

WHEREAS, all variances granted by the Director will expire on or before October 5, 1984; and

WHEREAS, the review of the Respondent's hazardous waste permit application will not be complete, nor will a permit be issued prior to this expiration date; and

WHEREAS, the continued operation of the Respondent's facility is considered to be in the best interest of the citizens of the State of Georgia; and

WHEREAS, Section 6(11) of the Act authorizes the Director to issue an Order necessary to insure and enforce compliance with the provisions of the Act and the rules promulgated thereunder.

NOW, THEREFORE, the Director hereby Orders the Respondent to do and accomplish the following:

1. The Respondent shall comply with Chapter 391-3-11-.10(1) and 391-3-11-.05 of the Georgia Rules for Hazardous Waste Management - Standards Applicable to the Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities.

2. The Respondent shall notify the Director within 45 days of the date of this Order if withdrawal of the Respondent's Part A hazardous waste facility permit application will be requested.

3. The Respondent shall submit a Part B hazardous waste permit application to the Director of EPD by December 16, 1985, unless the Respondent's Part A hazardous waste permit application is withdrawn prior to this date.

4. The Respondent shall submit to the Director a written progress report detailing the status of the Part B hazardous waste permit preparation 90 days prior to the date the Part B is due.

The continued operation of this facility prior to issuance of a permit is fully contingent upon compliance with Items 1. through 4. above and that the continued operation of this facility does not pose an undue present or potential threat to the environment, or to the health of humans.

This Order shall terminate upon a final agency decision to either issue or deny a permit in accordance with the provisions of Chapter 391-3-11-.11(4) and (5) of the Georgia Rules for Hazardous Waste Management and O.C.G.A. §12-2-2 (c)(2).

The Respondent is hereby informed of the right to be represented by legal counsel; to file an appeal from this Order; and that this Order shall become final unless a request is made for a hearing with the EPD, Department of Natural Resources, within thirty (30) days from the date of receipt of this Order.

The original of any petition for hearing, response or other pleading in this

matter, shall be filed with the Hearing Officer for the Board of Natural Resources, to wit:

The Honorable James B. Talley
Senior Administrative Law Judge
Department of Natural Resources
Room 815, Trinity-Washington Building
270 Washington Street, S.W.
Atlanta, Georgia 30334

One copy of any such petition for hearing, response or other pleading in this matter, shall be filed with the Director of EPD, to wit:

J. Leonard Ledbetter, Director
Environmental Protection Division
Department of Natural Resources
Room 825, Trinity-Washington Building
270 Washington Street, S.W.
Atlanta, Georgia 30334

So Ordered this 3rd day of July, 1984.

WITNESS AND SEAL

Sandra E. Hasser

SANDRA E. HASSER
Notary Public, Georgia, State At Large
My Commission Expires May 23, 1988

GEORGIA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

BY: J. Leonard Ledbetter
J. Leonard Ledbetter, Director

00870

EXHIBIT C

NEWTON COUNTY HEALTH DEPARTMENT SURVEY

Newton County Health Department

5220 HIGHWAY 278 • COVINGTON, GEORGIA 30209 • TELEPHONE 786-9086

June 11, 1985

Mr. Ned E. Downs
Hercules Inc.
P. O. Box 8
Oxford, Georgia 30267

Dear Mr. Downs:

A survey around the property boundary of Hercules, Inc. was conducted and no individual wells were found. However, this survey was not a door to door survey so their could be an isolated well located in this area. It appears that most of this area is served by city or county water.

If I can be of any further assistance, please feel free to call.

Sincerely,

Larry Martin,
Sr. Sanitarian

LM/sw

EXHIBIT D

SAMPLE ANALYSIS RESULTS

Microbac Laboratories, Inc.
Southeast Lab Division
1490 Mecaslin Street, N.W., Atlanta, GA 30309
404/873-1896 (Fax) 404/873-1880

Air • Fuel • Water • Food • Wastes

CERTIFICATE OF ANALYSIS

REVISED

Hercules
Po Box 8
Oxford, Ga 30267

October 12, 1994
Report No. 45277
PO # 45407JLD

ATTN: Pat Kitchens

SAMPLES SUBMITTED: 1 water sample

DATE SAMPLES RECEIVED: 9-12-94

LAB I.D.#: 45277-1,2,3 **SAMPLE I.D.:** Combined wastewater composite 9-10 to 9-11/1:30-1:30

TEST	RESULT	UNITS	*MDL	METHOD	DATE/TIME OF ANALYSIS	ANALYST
Acenaphthene	< 5	ppb	5	625	9-22-94/9:11	SEN
**(2)Benzene	< 1	ppb	1	601/602	9-19-94/12:20	YK
Carbon Tetrachloride	< 5	ppb	5	601/602	9-19-94/12:20	YK
Chlorobenzene	< 2	ppb	2	601/602	9-19-94/12:20	YK
1,2,4-Trichlorobenzene	< 5	ppb	5	625	9-22-94/9:11	SEN
Hexachlorobenzene	< 5	ppb	5	625	9-22-94/9:11	SEN
1,2-Dichloroethane	< 1	ppb	1	601/602	9-19-94/12:20	YK
1,1,1-Trichloroethane	< 0.5	ppb	0.5	601/602	9-19-94/12:20	YK
Hexachloroethane	< 5	ppb	5	625	9-22-94/9:11	SEN
1,1-Dichloroethane	< 1	ppb	1	601/602	9-19-94/12;20	YK
1,1,2-Trichloroethane	< 0.5	ppb	0.5	601/602	9-19-94/12;20	YK
Chloroethane	< 2	ppb	2	601/602	9-19-94/12;20	YK
Chloroform	10	ppb	1	601/602	9-19-94/12;20	YK
1,2-Dichlorobenzene	< 2	ppb	2	601/602	3-15-94/5:00	SEN
1,3-Dichlorobenzene	< 2	ppb	2	601/602	3-15-94/5:00	SEN
1,4-Dichlorobenzene	< 2	ppb	2	601/602	3-15-94/5:00	SEN
1,1-Dichloroethylene	< 1	ppb	1	601/602	9-19-94/12;20	YK
1,2-trans-Dichloroethylene	< 5	ppb	5	601/602	9-19-94/12;20	YK
1,2-Dichloropropane	< 1	ppb	1	601/602	9-19-94/12;20	YK
1,3-Dichloropropylene	< 0.5	ppb	0.5	601/602	9-19-94/12;20	YK
2,4-Dimethylphenol	< 10	ppb	10	604	9-20-94/10:00	YK
Ethylbenzene	< 1	ppb	1	601/602	9-19-94/12;20	YK
Fluoranthene	< 5	ppb	5	625	9-22-94/9:11	SEN
Methylene Chloride	< 5	ppb	5	601/602	9-19-94/12;20	YK
Methyl Chloride	< 5	ppb	5	601/602	9-19-94/12;20	YK
Hexachlorobutadiene	< 5	ppb	5	625	9-22-94/9:11	SEN
Naphthalene	< 5	ppb	5	625	9-22-94/9:11	SEN
Nitrobenzene	< 5	ppb	5	625	9-22-94/9:110	SEN

NOTE: Revised to show correct method for Total Cyanide.

*MDL: Method Detection Limit.

RESULTS CONTINUED ON NEXT PAGE

REVISED
Hercules
page 2 of 4
October 12, 1994
Report No. 45277
PO # 45407JLD

Cont:

SAMPLE I.D.: Combined wastewater composite 9-10 to 9-11/1:30-1:30

TEST	RESULT	UNITS	*MDL	METHOD	DATE/TIME OF ANALYSIS	ANALYST
2-Nitrophenol	< 10	ppb	10	604	9-20-94/10:00	YK
**(3)4-Nitrophenol	< 100	ppb	100	604	9-20-94/10:00	YK
4,6-Dinitro-0-cresol	< 20	ppb	20	604	9-20-94/10:00	YK
Phenol	< 10	ppb	10	604	9-20-94/10:00	YK
Bis(2-ethylhexy) phthalate	< 5	ppb	5	625	9-22-94/9:11	SEN
Di-n-butyl phthalate	10	ppb	5	625	9-22-94/9:11	SEN
Diethyl phthalate	< 5	ppb	5	625	9-22-94/9:11	SEN
Dimethyl phthalate	< 5	ppb	5	625	9-22-94/9:11	SEN
Anthracene	< 5	ppb	5	625	9-22-94/9:11	SEN
Fluorene	< 5	ppb	5	625	9-22-94/9:11	SEN
Phenanthrene	< 5	ppb	5	625	9-22-94/9:11	SEN
Pyrene	< 5	ppb	5	625	9-22-94/9:11	SEN
Tetrachloroethylene	< 5	ppb	5	601/602	9-19-94/12;20	YK
Toluene	< 1	ppb	1	601/602	9-19-94/12;20	YK
Trichloroethylene	< 1	ppb	1	601/602	9-19-94/12;20	YK
Vinyl Chloride	< 2	ppb	2	601/602	9-19-94/12;20	YK
****(1)Total Cyanide**	**0.003**	**ppm**	**0.002**	**335.2**	**9-15-94/2:30**	**JC**
Total Lead	< 0.005	ppm	0.005	239.2	9-14-94/4:15	PN
Total Zinc	0.125	ppm	0.005	289.1	9-15-94/10:15	PN
BOD	307	ppm	1	405.1	9-12-94/6:20	ES
TSS	42	ppm	4	160.2	9-14-94/1:30	IE

*MDL: Method Detection Limit
**(1) Composite of grab samples 9-9-94/8:15-9:30-11:15-1:30
**(2) Composite of grab samples 9-9-94/8:15-9:30-11:15-1:30
**(3) Method Detection limit higher than normal due to interference in sample.

NOTE: Revised to show correct method for Total Cyanide.

RESULTS CONTINUED ON NEXT PAGE

REVISED
Hercules
page 3 of 4
October 12, 1994
Report No. 45277
PO # 45407JLD

LAB I.D.#: 45277-1,2,3 **SAMPLE I.D.:** Volatiles Blank

VOC:

	RESULTS(ppb)	*MDL
Bromodichloromethane	< 0.2	0.2
Bromoform	< 0.4	0.4
Bromomethane	< 1	1
Carbon Tetrachloride	< 0.1	0.1
Chlorobenzene	< 0.3	0.3
Chloroethane	< 0.3	0.3
Chloroform	< 0.1	0.1
Chloromethane	< 1	1
Dibromochloromethane	< 0.2	0.2
1,2 Dichlorobenzene	< 0.4	0.4
1,3 Dichlorobenzene	< 0.3	0.3
1,4 Dichlorobenzene	< 0.4	0.4
Dichlorodifluoromethane	< 1	1
1,1 Dichloroethane	< 0.2	0.2
1,2 Dichloroethane	< 0.2	0.2
1,1-Dichloroethene	< 0.2	0.2
T-1,2-Dichloroethene	< 0.1	0.1
1,2-Dichloropropane	< 0.2	0.2
C-1,3-Dichloropropene	< 0.1	0.1
T-1,3-Dichloropropene	< 0.1	0.1
Methylene Chloride	0.9	0.5
1,1,2,2-Tetrachloroethane	< 0.6	0.6
Tetrachloroethene	< 0.1	0.1
1,1,1-Trichloroethane	< 0.1	0.1
1,1,2-Trichloroethane	< 0.1	0.1
Trichloroethene	< 0.2	0.2
Trichloroflouromethane	< 0.2	0.2
Vinyl Chloride	< 0.4	0.4
Benzene	0.4	0.2
Toluene	< 0.2	0.2
Ethylbenzene	< 0.2	0.2
Xylenes	< 0.4	0.4

DATE/TIME OF ANALYSIS: 9-15-94/2:00
ANALYST:YK
METHOD: 601/602
NOTE: Revised to show correct method for Total Cyanide.

RESULTS CONTINUED ON NEXT PAGE

Microbac Laboratories, Inc
Southeast Lab Division
1490 Mecaslin Street, N.W., Atlanta, GA 30309
404/873-1896 (Fax) 404/873-1880

Air • Fuel • Water • Food • Wastes

CERTIFICATE OF ANALYSIS

REVISED
page 1 of 3
February 21, 1995
Report No. 43016
PO # 54655JLD

Hercules
Po Box 8
Oxford, Ga 30267

ATTN: Pat Kitchens

SAMPLES SUBMITTED: 3 Water Samples
DATE SAMPLES RECEIVED: 1-18-95
LAB I.D.#: 46016-1 SAMPLE I.D.: #1 DI Water Blank 1-16-95/1:30

VOC:	RESULTS(ppb)	*MDL
Bromodichloromethane	< 0.2	0.2
Bromoform	< 0.4	0.4
Bromomethane	< 1	1
Carbon Tetrachloride	< 0.1	0.1
Chlorobenzene	< 0.3	0.3
Chloroethane	< 0.3	0.3
Chloroform	< 0.1	0.1
Chloromethane	< 1	1
Dibromochloromethane	< 0.2	0.2
1,2 Dichlorobenzene	< 0.4	0.4
1,3 Dichlorobenzene	< 0.3	0.3
1,4 Dichlorobenzene	< 0.4	0.4
Dichlorodifluoromethane	< 1	1
1,1 Dichloroethane	< 0.2	0.2
1,2 Dichloroethane	< 0.2	0.2
1,1-Dichloroethene	< 0.2	0.2
T-1,2-Dichloroethene	< 0.1	0.1
1,2-Dichloropropane	< 0.2	0.2
C-1,3-Dichloropropene	< 0.1	0.1
T-1,3-Dichloropropene	< 0.1	0.1
Methylene Chloride	< 0.5	0.5
1,1,2,2-Tetrachloroethane	< 0.6	0.6
Tetrachloroethene	< 0.1	0.1
1,1,1-Trichloroethane	< 0.1	0.1
1,1,2-Trichloroethane	< 0.1	0.1
Trichloroethene	< 0.2	0.2
Trichloroflouromethane	< 0.2	0.2
Vinyl Chloride	< 0.4	0.4
Benzene	< 0.2	0.2
Toluene	< 0.2	0.2
Ethylbenzene	< 0.2	0.2
Xylenes	< 0.4	0.4

DATE/TIME OF ANALYSIS: 1-24-94/5:00
ANALYST:YK
METHOD: 601/602

RESULTS CONTINUED ON NEXT PAGE

EXHIBIT E

JUNE 12, 1991 TRIP REPORT

Georgia Department f Natural Resources
205 Butler Street, S.E., Suite 1252, Atlanta, Georgia 3033
Joe D. Tanner, Commissione
Harold F. Reheis, Direct
Environmental Protection Divisic

TRIP REPORT

Site Name and Location: Hercules,Inc.
Oxford, Georgia 30267

TRIP BY: Jane Hendricks

ACCOMPANIED BY: Bruce Khaleghi
Reginald Young RY

DATE OF TRIP: June 12, 1991

OFFICIALS CONTACTED: Patrick Kitchens

REFERENCE: Compliance Evaluation Inspection

COMMENTS:

The purpose of this inspection was to evaluate compliance with Permit HW-028(s) and the Georgia Rules for Hazardous Waste Management.

Hercules-Oxford manufactures polypropylene fiber in continuous filament, bulked continuous filament, and staple form. Hercules is currently moving towards production of less carpet fiber and more absorbent fiber to be used in disposal diapers, as well as planning a return to production of fiber used in upholstery.

Polypropylene in flake form is piped to either plant two to produce staple form fiber or to the spin tower in plant one to produce filament form fiber. As the polypropylene travels from top to bottom of the spin tower it is mixed with colorants and stabilizers, blended, melted, put through extruders and spinnerettes, and finally spun onto spools. This inspection focused on plant 1 and the container storage area.

No hazardous waste are produced by any manufacturing process. The following hazardous wastes are commercial products which were used for equipment cleaning, laboratory, or support operations:

D001
- isopropyl alcohol used in the lab,
- mineral spirits and stoddard solvents used to clean mechanical parts
- hitec salt used in a molten salt bath to remover polymer from filters and spin pack parts,
- Dow J/$H_2$0 used as heat transfer fluid in spin beams.

Docket #86

F003	•Acetone used in the lab to dry sample bottles, •Xylene and methanol generated from Q.C. testing in the lab,
F002, F003, F004	•Big Dipper, a methylene chloride, xylene, and cresol compound, used as a cleaning solvent,
D002	•Nitric acid used in cleaning polymer filter elements,
F002	•Trichlorofluoromethane contamination of lubricating oil in chillers.

The majority of the facility's hazardous waste come from parts cleaning operations (solvents, Hitec salt, nitric acid). The molten salt bath generates about two drums of hazardous waste when it is pumped out every two months. The nitric acid bath drains into a drum which is cleaned out once every three or four months. The floor cleaning water from the parts cleaning area travels through a floor drain and is tested at a sampling point before release into the city sewer.

A large quantity of non-hazardous waste in the form of fiber lubricant with a coconut oil type base is generated.

The west end of the covered container storage area is restricted to hazardous waste storage. A concrete curb forms a secondary containment basin. The concrete floor slopes towards a grate covered drain trench. Hercules is permitted to store 5720 gallons of hazardous waste in this area.

At the time of inspection, the epoxy based floor coating was cracked and broken. The problem had been noted daily in the inspection logs since April 10, 1991. According to Mr. Kitchens, a work order had been submitted to remove the floor coating, make any necessary repairs, and recoat the floor with a more durable material. Cracks in the concrete berm were also noted.

During the records review, documents including manifests, operating record, training records, inspection logs, and portions of the Part B application were inspected. Mr. Kitchens stated that Hercules had no newly listed hazardous wastes under the Toxicity Characteristic Rule.

CONCLUSIONS:

The floor of the container storage area must be repaired soon.

RECOMMENDATIONS AND FOLLOW-UP REQUIRED:
Send NOV requiring documentation of floor repair

PHOTOGRAPHS: One

REVIEWED BY:

ATTACHMENTS:
Hazardous Waste Facility Permit Inspection Checklist.

JH:cm

File: Hercules, Oxford

EXHIBIT F

CONTAINER STORAGE BUILDING FLOOR REPAIR VERIFICATION

JANE

HERCULES

Interoffice Mei

August 6, 1991

RECEIVED

AUG 9 1991

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Jim Ussery
Unit Coordinator
Hazardous Waste Management Program
Environmental Protection Division
205 Butler Street, S.E.
Suite 1252
Atlanta, GA 30334

Dear Mr. Ussery:

This is to inform your office that Hercules Incorporated, Oxford Plant, has corrected the (Hazardous Waste) Container Storage Area Floor problem. Attached is documentation that the floor was repaired, and new floor coating applied.

If you require further information, please contact me at 404/786-7011, extension 220.

Sincerely,
HERCULES INCORPORATED

Patrick R. Kitchens
Environmental Coordinator

PRK/ds

cc: E. A. Ikenberry*
R. G. Henderson*

*NOV Attached

0212f

Docket #88

HER. 715
PRINTED IN U.S.A.

HERCULES

Hercules Incorporated
P. O. Box 8
Oxford, GA 30267

Purchase Orde
Requisition

VENDOR'S ACCOUNT NO.	PAY TO	DATE	NON-TAXABLE / TAXABLE	EXEMPTION NO.	CONFIRMATION DO NOT DUPLICATE	PURCHASE ORDER NO.
		7/19/91			YES [ ] NO [X]	22028

IF SPECIAL OR MINIMUM CHARGES APPLY TO THIS ORDER PLEASE ADVISE BEFORE PROCESSING.

SHOW PURCHASE ORDER NO. ON EACH PACKAGE. THREE COPIES OF INVOICE AND PACKING SLIP.

VENDOR:
000221
STONEHARD
4410 HIGHLAND PKWY
SMYRNA, GA 30080

SHIP TO:
Hercules Incorporated
Alcovy Road
Covington, Georgia 30209

BILL TO:

SHIP DATE	VIA	F.O.B.	TERMS
SCHED.	VT	JS	N

ITEM	QUANTITY	DESCRIPTION (USE BALL POINT PEN)	PRICE
A	1 LOT	TO COVER COST OF LABOR, MATERIALS AND EQUIPMENT TO REPAIR APPROX 100 SQ FT OF FLOOR WITH STONCLAD HT AND COAT APPROX 800 SQ FT WITH STONKOTE HT4 PER VENDOR QUOTE.	2213.00

BUY
MIGUEL E. LEYVA

DATE REC'D	CHECKED BY	CAR NO	INVOICE DATE	FRT. BILL NO.	DATE INV. APR.	FRT BILL AMT	INV NET AMT

ACCOUNT IDENTIFICATION CODE	NO OF PKGS.	B/LND.	ISSUED BY	MISC NUMBER
C08-062-03H460	PKG. WTG	SHIP DATE		84661
	PKG. DIMENSIONS	PER	APPROVED	

FOR HAZARDOUS WASTE STORAGE AREA WO# 63159

DELIVER TO: D. PHILLIPS

PURCHASE ORDER NO

AREA THAT MATERIAL IS TO BE DELIVERED MUST BE FILLED IN ABOVE

1. RECEIVING DEPARTMENT

#9

STONHARD
FLOORS·COATINGS·LININGS
CONSTRUCTION PRODUCTS

INVO

REMIT TO : STONHARD, INC.
c/o P O. Box 8538 Zo.
Philadelphia, Pa 19171

PRINTED ON: 02 AUG 91

SHIPPED FROM	SHIPPED VIA	F.O.B.	INVOICE NUMBER
SMYRNA		PREPAID	04140548 99

BILLING ADDRESS	SHIPPING ADDRESS
Hercules, Inc. P.O. Box 8 Oxford, Georgia 30267 Mr Daryl Phillips	Hercules, Inc Alcovey Road Covington, GA 30209 ATTN: Mr. Daryl Phillips

TERMS	PURCHASE ORDER #	ORDER DATE	SALES CODE	INVOICE DATE
NET 10 DAYS	[redacted]	29 JUL 91	0400249 Bruce	02 AUG 91

Billing for Stonhard Installation - Final Billing	$2500 00

Daryl Phillips

AMOUNT DUE $2,500 00

We hereby certify that these goods were produced in compliance with all applicable requirements of Sections 6 7 and 12 of the Fair Labor Standards Act as amended and of regulations and orders of the United States Department of Labor issued under Section 14 thereof

3

EXHIBIT G

APRIL 9, 1993 NOTICE OF VIOLATION

Georgia Department of Natural Resources
205 Butler Street, S.E., Suite 1252, Atlanta, Georgia 30334
Joe D. Tanner, Commissioner
Harold F. Reheis, Director
Environmental Protection Division

FILE COPY

April 9, 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Patrick Kitchens
Hercules, Inc.
P.O. Box 8
Oxford, GA 30267

Re: Notice of Violation

Dear Mr. Kitchens:

Please reference the December 4, 1992 inspection of Hercules, Inc. by the Environmental Protection Division (EPD). This inspection was conducted to evaluate your facility's compliance with the Georgia Rules for Hazardous Waste Management, the conditions of Hazardous Waste Facility Permit Number HW-028(S), and the Hazardous Waste Management Act. The facility was found in violation of the Rules as follows:

Section 391-3-11-.08 "Standards Applicable to Generators of Hazardous Waste"

§262.34 "Accumulation Time", for failure to indicate the accumulation date of 2 eight (8) gallon drums containing nickel-cadmium batteries and mercury, and 2 fifty-five (55) gallon drums containing nitric acid and waste ammonia.

Section 391-3-11-.10 "Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities"

§264.31 "Design and Operation of Facility", since sulfuric acid was released onto the floor in the parts cleaning room increasing the possibility of a sudden or non-sudden release of hazardous wastes into the environment.

Section 391-3-11-.16 "Land Disposal Restrictions"

§268.50 "Prohibitions on Storage of Restricted Wastes" for storing a 55 gallon drum of D001 waste (mineral spirits) for a period longer than a year. This waste is restricted and can be stored at a treatment, storage, and disposal facility (TSD) for up to one year without demonstration that such storage is solely for the purpose of accumulation of sufficient quantities to facilitate proper recovery, treatment, or disposal. For storage of restricted wastes beyond one year, the

TSD must prove that such storage is only for the purpose stated above. There was no such demonstration available during the inspection.

Please provide, within thirty (30) days of the date of receipt of this letter, documentation that the above violation have been corrected.

If you have any questions, please contact Amy Potter at 404/656-2833.

Sincerely,

Jan Simmons

Jan Simmons
Unit Coordinator
Hazardous Waste Management Branch

JES:ap
file: Hercules, Oxford (R)

EXHIBIT H

SALT POT ROOM FLOOR REPAIR

LAW

ENGINEERING AND ENVIRONMENTAL SERVICES

REPORT OF

ENVIRONMENTAL CONSULTING SERVICES

COVINGTON, GEORGIA FACILITY

Submitted to:

HERCULES, INC.
Oxford, Georgia

October 1993

2.0 SCOPE OF SERVICES

Law Environmental, Inc. personnel conducted a site visit at the Hercules, Inc. facility in Covington, Georgia on September 7, 1993, to assess the horizontal and vertical extent of possible migration of wastewater in the soils. During the site visit, representatives of Law installed four soil test borings in likely areas where wastewater constituents may have migrated. The borings were installed to the top of the underlying bedrock as indicated by auger refusal. Split spoon soil samples were collected at 2 1/2 foot intervals and analyzed for pH according to SW-846 Method 9045 modified for use in the field. Details of these activities are provided in the following sections.

3.0 SUBSURFACE SOIL INVESTIGATION

3.1 Location of Soil Borings

Boring locations were chosen to detect the possible migration of wastewater in the subsurface soils below and adjacent to the cleaning building in the back portion of the Hercules facility. Four initial borings (B-1 through B-4) were proposed, three along the front of the building (east) and a fourth boring along the northern side of the building (Figure 1). These locations were based in part on the results of previous soil borings as reported by Law Engineering Testing Company (Report of Subsurface Investigation, August 29, 1969). The 1969 report indicated the presence of bedrock near the ground surface (3.8 to 5.3 feet below ground surface) west of the present cleaning building and along the existing railroad line. This report indicated the depth to the top of the bedrock below the ground surface increases in a northeasterly direction to approximately 20 feet below the present ground surface in the area northeast of the cleaning building. Ground water was not detected above the underlying bedrock. Thus, it appears likely that migration of wastewater from the facility would have occurred down and across the surface of the underlying bedrock toward the northeast following the top of bedrock. Based on the results obtained in the initial four borings, no additional borings were performed.

3.2 Installation of Soil Borings

On September 7, 1993, four soil test borings (B-1 through B-4) were drilled at the locations shown on Figure 1. The borings were drilled to depths ranging from 3 to 21 feet below ground surface (BGS) by a truck mounted drill rig using 4.25-inch inside diameter (I.D.) continuous flight hollow-stem augers.

Soil samples were collected in each soil test boring at 2.5-foot intervals from one foot BGS to boring termination using an 18-inch long split-spoon sampler driven into the soil by a 140-pound hammer falling 30 inches. The soil samples were visually described by Law personnel according to the appearance and the type of material recovered by the split spoons. A description of the soil borings is presented on the boring records included in Appendix A. Ground water was not encountered in the soil borings. Approximately 20 to 30 grams of soil obtained from each of the split spoon samples was placed into labeled eight-ounce glass jars for soil pH measurements. The test borings were backfilled with soil following sample collection.

A hand auger was used to collect two background samples from locations thought to be unaffected by the drain pipe to establish naturally occurring soil pH levels for the site. Background samples were collected from two hand auger borings located in an accessible grassy area east of the drum storage building and west of the plant service road. Hand auger samples were collected at depths from 1 to 2 feet below the ground surface.

3.3 Analytical Results

Soil pH measurements were conducted using SW-846 Method 9045 modified for use in the field. An approximate 1:1 (weight:weight) suspension of soil and distilled water was prepared from each background sample and from each sample collected during installation of the soil test borings. The soil and water suspension was stirred and mixed several times during the next 15 to 30 minutes by agitating the sample by hand. Following agitation, the suspensions were allowed to stand undisturbed for approximately 30 to 60 minutes to provide time for solids to settle from suspension.

A portable pH meter (Orion Model 250A) was used to measure the pH of the supernatant solutions for each soil sample. Operation of the pH meter was calibrated and checked using fresh buffered solutions at pH values of 4.0 and 7.0 (VWR Scientific). Measurements of pH

in the buffer solutions and the samples were conducted at ambient field temperatures ranging from 33 to 35°C. The combination pH/temperature electrode was thoroughly rinsed with distilled water between samples. The measured pH of both background soil samples was 6.2. Results of soil boring pH measurements are reported in Table 1 and are indicated in the Soil Test Boring Records in Appendix A.

4.0 CONCLUSIONS

The pH of soil samples collected from the four test borings ranged from 4.4 to 6.6; however, the majority of soil pH values ranged over a more narrow range from 4.4 to 4.7. Background soil pH values were 6.2. It appears that there is a slight difference in the measured soil sample pH values and the pH of the background samples; however, this difference is probably due to the grassy nature of the area from which the background samples were collected. The pH of the background soil samples may indicate horticultural amendment of the soil properties. Jim Lathem from the U.S. Department of Agriculture, Soil Conservation Service Office in Newton County was contacted on September 27, 1993, to determine a range of typical values for pH in unamended soils in the county. Jim indicated that soil pH values from 4.5 to 5.0 were typical of subsurface soils derived from weathered bedrock in Newton County.

Based on a review of available site information and the analytical results of soil pH measurements at the Hercules facility, the following conclusions are made:

- Ground water was not detected onsite in the soil borings above the underlying surface of the bedrock.
- Possible wastewater in the subsurface would tend to migrate along the surface of bedrock underlying the site. Migration would be expected to occur in the downgradient direction of increasing bedrock depth.
- The pH of soil samples collected at the Hercules facility ranged from 4.4 to 6.6. The pH of background soil samples was 6.2. Typical soil pH for the area is 4.5 to 5.0.
- The measured pH of the soil boring samples does not indicate a detectable presence of subsurface wastewater.
- No additional borings appear to be necessary to define the extent of possible vertical and horizontal migration of wastewater in the subsurface soils near the cleaning building.

TABLE

Table 1: Analytical Results – Soil Test Borings
Hercules, Inc.
Covington, Georgia Facility
Law Environmental Project No. 41–3564

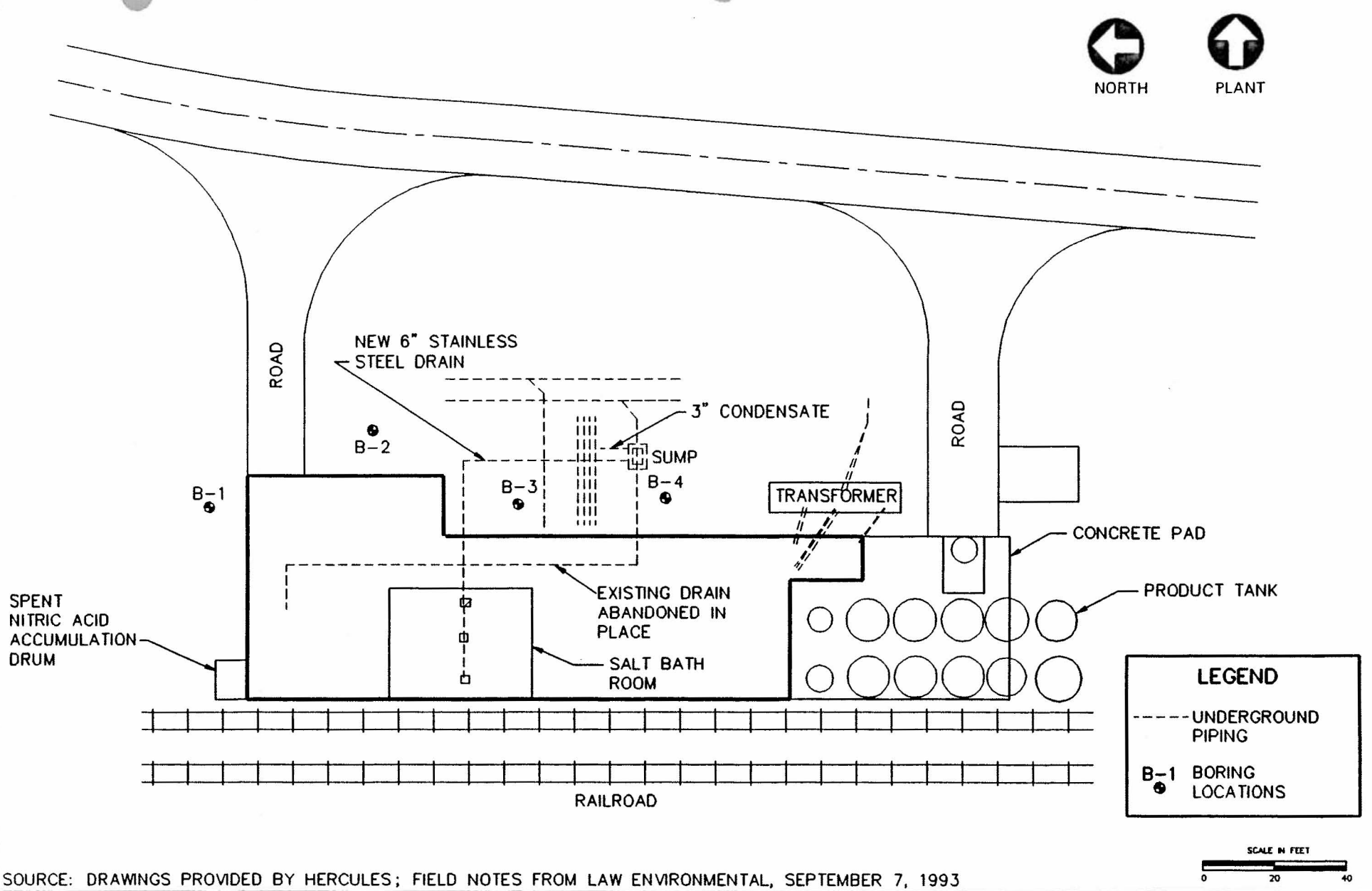
Sample Depth (ft)	Boring Number / pH			
	B–01	B–02	B–03	B–04
1.0 – 2.5	5.7	4.5	4.7	6.6
3.5 – 5.0	4.9	4.7	--	4.7
6.0 – 7.5	4.5	4.7	--	5.1
8.5 – 10.0	4.4	4.7	--	--
11.0 – 12.5	4.4	4.8	--	--
13.5–15.0	4.4	4.9	--	--
16.0 – 17.5	4.6	--	--	--
18.5 – 20.0	5.0	--	--	--

Notes:
Soil pH values measured using EPA Method 9045 modified for use in the field.
-- Sample not collected due to auger refusal.

Prepared by/date: J Coates / 9-22-93
Checked by/date: [illegible] 1-17-13

g:\users\4112\jcoates\hercules\table1.wk1

FIGURE



SOURCE: DRAWINGS PROVIDED BY HERCULES; FIELD NOTES FROM LAW ENVIRONMENTAL, SEPTEMBER 7, 1993

HERCULES, INC. COVINGTON, GEORGIA	**LAW ENVIRONMENTAL, INC.**	SITE LAYOUT AND BORING LOCATION MAP PROJECT NO. 41-3564 FIGURE 1

PREPARED BY/DATE: EC 9-26-93
CHECKED BY/DATE: JSK 9-27-93

APPENDIX A
TEST BORING RECORDS

TEST BORING RECORD

ELEVATION (FEET)	DEPTH (FEET)	DESCRIPTION	Soil pH	PENETRATION-BLOWS PER FOOT (0 5 10 15 20 40 60 80 100)
	0.2	ASPHALT		
		Firm to reddish fine sandy SILT (fill)	5.7	● 8
			4.9	● 12
			4.5	● 7
	8.0	Firm reddish fine sandy SILT	4.4	● 8
	10.5	Stiff mottled white to light tan fine sandy SILT	4.4	● 9
	13.0	Stiff light brown fine sandy micaceous SILT	4.4	● 10
	16.0	Stiff micaceous fine sandy SILT with quartz gravel	4.6	● 10
	18.0	Stiff mottled white to light brown fine sandy SILT		
	19.0	Mottled greyish weathered granitic GNEISS	5.0	● 23
	21.0	Auger refusal at 21.0 feet		

REMARKS:

1) Boring drilled using 4.25-inch I.D. hollow stem augers.
2) Soil pH values measured using SW-846 Method 9045 modified for use in the field.

DRILLED BY	LAW
LOGGED BY	JAC
CHECKED BY	CDN

BORING NUMBER	B-1
DATE STARTED	09-07-93
DATE COMPLETED	09-07-93
JOB NUMBER	41-3564

Law Environmental

TEST BORING RECORD

ELEVATION (FEET)	DEPTH (FEET)	DESCRIPTION	Soil pH	PENETRATION-BLOWS PER FOOT (0 5 10 15 20 40 60 80 100)
	0.2	GRAVEL		
		Loose to firm reddish fine to medium micaceous SAND (fill)	4.5	● 13
			4.7	● 8
	5.5	Firm reddish fine to medium micaceous sandy SILT	4.7	● 8
	8.0	Stiff mottled greyish silty weathered granitic GNEISS	4.7	● 11
	11.0	Stiff tan fine sandy micaceous SILT with weathered granitic gneiss	4.8	● 13
	13.0	Silty weathered granitic GNEISS	4.9	● 16
	15.0	Auger refusal at 15.0 feet		

REMARKS:

1) Boring drilled using 4.25-inch I.D. hollow stem augers.
2) Soil pH values measured using SW-846 Method 9045 modified for use in the field.

DRILLED BY	LAW
LOGGED BY	JAC
CHECKED BY	CDN

BORING NUMBER	B-2
DATE STARTED	09-07-93
DATE COMPLETED	09-07-
JOB NUMBER	41-3564

Law Environmental

TEST BORING RECORD

ELEVATION (FEET)	DEPTH (FEET)	DESCRIPTION	Soil pH	PENETRATION-BLOWS PER FOOT (0, 5, 10, 15, 20, 40, 60, 80, 100)
	0.2	GRAVEL		
		Very soft reddish fine micaceous sandy SILT (fill)	4.7	● 2
	3.0	Auger refusal at 3.0 feet		

REMARKS:

1) Boring drilled using 4.25-inch I.D. hollow stem augers.
2) Soil pH values measured using SW-846 Method 9045 modified for use in the field.

DRILLED BY	LAW
LOGGED BY	JAC
CHECKED BY	CDN

BORING NUMBER	B-3
DATE STARTED	09-07-93
DATE COMPLETED	09-07-93
JOB NUMBER	41-3564

Law Environmental

TEST BORING RECORD

ELEVATION (FEET)	DEPTH (FEET)	DESCRIPTION	Soil pH
	0.2	GRAVEL	
		Firm orange to light brown fine silty SAND with weathered granitic gneiss	6.6
	3.0	Mottled greyish weathered granitic GNEISS	4.7
	7.0	Auger refusal at 7.0 feet	5.1

PENETRATION-BLOWS PER FOOT

0 5 10 15 20 40 60 80 10

● 8 ● 21

REMARKS:

1) Boring drilled using 4.25-inch I.D. hollow stem augers.
2) Soil pH values measured using SW-846 Method 9045 modified for use in the field.

DRILLED BY	LAW	BORING NUMBER	B-4
LOGGED BY	JAC	DATE STARTED	09-07-93
CHECKED BY	CDN	DATE COMPLETED	09-07
		JOB NUMBER	41-3564

Law Environmental

EXHIBIT I

JUNE 28, 1985 TRIP REPORT

J. LEONARD LEDBETTER
Commissioner

Department of Natural Resources
ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

FILE COPY

July 3, 1985

TRIP REPORT

Docket # 16

SITE NAME AND LOCATION: . . . . . Hercules Oxford Plant
Oxford, GA

TRIP BY: . . . . . Behrooz Khaleghi B.K

ACCOMPANIED BY: . . . . . None

DATE OF TRIP: . . . . . June 28, 1985

OFFICIALS CONTACTED: . . . . . Mr. Ned Downs
Environmental Coordinator

REFERENCE: . . . . . Annual ISS Inspection

COMMENTS:

This plant produces polypropylene yarn. This involves unloading, conveying, and blending of polypropylene flakes; polymer extrusion; and yarn take-up and processing. The facility has interim status for container storage.

Waste generated includes:

1. D002 - Nitric acid is generated from cleaning metal parts in the amount of less than one drum per month.

2. U239 - Xylene is generated from laboratory functions in the amount of 3 - 4 drums per year.

3. F002 - Spent halogenated solvent (methylene chloride) is generated from the cleaning of spin beams. Estimated accumulation rate is approximately one drum per month.

4. D001 - Isoproponal and mineral spirits are generated from cleaning of shop tanks, gears, pumps, etc., at the rate of less than one drum per month.

5. U154 - Methanol is generated from laboratory functions in small quantities.

The container storage area is situated on a concrete floor with drain and roof and comprises a diked section of a larger building used for storage of drummed raw materials. The facility, also has four underground product tanks, and there were twelve (12) drums containing hazardous wastes in the storage at the time of the inspection.

The plant's waste oils have been kept outside, near the hazardous storage area in 55 gallon drums. Some spilled oil in various areas was obvious. Also, the hazardous waste drums in the storage area were too close to the dike's edge.

CONCLUSIONS:

Facility is in violation of the rules promulgated pursuant to the Solid Waste Management Act. No violation of the Interim Status Standards were noted.

RECOMMENDATION AND FOLLOW-UP REQUIRED:

Send Notice of Violation

PHOTOGRAPHS: . . . . . None

REVIEWED BY: . . . . . Bill Mundy

ATTACHMENTS: . . . . . None

BK:kaw
(0011K)

cc: Behrooz Khaleghi

File: Hercules Oxford Plant (R)

Department of Natural Resources
ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S W
ATLANTA, GEORGIA 30334

J. LEONARD LEDBETTER
Commissioner

July 19, 1985

FILE COPY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ned Downs
Environmental Coordinator
Hercules, Incorporated
P. O. Box 8
Oxford, Georgia 30267

Re: Notice of Violation Docket #15

Dear Mr. Downs:

Please reference the inspection of the Hercules Oxford Plant by Behrooz Khaleghi of the Industrial and Hazardous Waste Management Program to determine your company's compliance status with Georgia's Rules for Hazardous Waste Management, chapter 391-3-11.10, standards for owners and operators of Hazardous Waste Treatment, Storage, and Disposal facilities. No violations of the Rules for Hazardous Waste Management were noted during the inspection, although drums of hazardous waste were stored too close to the edge of the dike. In the event of a spill the dike would not function to contain the waste. Please take the necessary action to move the hazardous waste drums away from the edge of the dike. However, this is not a violation of the Interim Status Standards since secondary containment is only required for permitted storage areas.

During the inspection it was also noted that there was obvious contamination of the soil by waste oil around the plant's waste oil storage area. Waste oil is not currently regulated under the hazardous waste regulations but it is subject to regulation under the rules and regulations adopted pursuant to the Solid Waste Management Act. In particular, chapter 391-3-4-.04 prohibits disposal of any solid waste in a non-approved manner.

Please arrange to have this oil contaminated soil removed, and disposed of properly and take the steps necessary to ensure that proper handling of the waste oil occurs in the future.

If there are questions, please contact Behrooz Khaleghi at (404) 656-7802.

Sincerely,

Bill Mundy

Bill Mundy, Unit Coordinator
Industrial & Hazardous Waste
Management Program

BM:BK/kaw
(0012K)
cc: Behrooz Khaleghi
File: Hercules, Oxford (R)

HERCULES

Hercules Incorporated
P. O. Box 8
Oxford, GA 30267
(404) 786-7011

August 30, 1985

Mr. Behrooz Khaleghi
Dept. of Natural Resources
Environmental Protection Div.
270 Washington St., S.W.
Atlanta, Georgia 30334

Re: Notice of Violation Dated July 19, 1985 - Oil Contaminated Soil Removal Progress Report

Dear Mr. Khaleghi:

This is in reply to your phone inquiry on August 30, 1985 about what progress we are making on the above notice of violation.

1. We took a random soil sample of the area in question and sent it to our permitted waste disposal company for analysis on August 12, 1985. Current analysis backlog time at this facility is 6 weeks; however, we are proceeding with the cleanup without waiting for lab results.

2. Our plan is to excavate the contaminated soil from the area and put it in 55-gallon steel drums with removal lids. The drums were shipped to Hercules on 8/27/85 and delivery is expected 9/4/85.

3. Excavation and loading of the contaminated soil into the drums is expected by 9/6/85.

4. The drums will be transported to and disposed of by our waste disposal company at their permitted waste disposal facility after laboratory results are known.

5. Some of the steps being taken to reduce the possiblity of reoccurrence are:

   a. Leave about 2" air space at the top of all drums when filling with used oil to avoid runout when drum is stored on a slope with bung plug to low side.

   b. All bungs must be plugged and sealed tight at all times.

   c. All drums upright and on CF type skids in good condition.

   d. Replace leaking drums when detected.

e. Inspect the area for missing bungs and leaking drums weekly; also immediately before used oil dealer leaves area after a pickup. Advise dealer to reinstall all bungs. Apply oil sorb to spills and clean up.

f. Advise used oil dealer to not permit any oil to get on the ground. (Removing pump hose from one drum to the next is a prime suspect for this.)

g. Avoid storing an excessive quantity of drums if possible.

Sincerely,

HERCULES INCORPORATED

N. E. Downs

Ned E. Downs
Environmental Coordinator

NED/ck
3979E

cc: B. C. Myhand - Hercules Inc., Oxford, Ga.
M. A. Maddox - Hercules Inc., Oxford, Ga.
W. J. Fisher, Jr. - Hercules Inc., Oxford, Ga.
D. M. Burton - Hercules Inc., Oxford, Ga.
W. K. Barnett - Hercules Inc., Oxford, Ga.
D. H. Maybury - Hercules Inc., Brunswick, Ga.
D. J. Keilman - Hercules Inc., Wilm., Del.

SALES CODE: MAR | E09501

WASTE PROFILE SHEET CODE

CERTIFICATION OF REPRESENTATIVE SAMPLE

GENERAL DIRECTIONS: IN ORDER TO DETERMINE WHETHER WE CAN ACCEPT THE SPECIAL WASTE DESCRIBED IN THE ABOVE NUMBERED PROFILE SHEET, WE MUST OBTAIN A REPRESENTATIVE SAMPLE OF THE WASTE. WE WILL ANALYZE THE SAMPLE TO VERIFY THE INFORMATION YOU HAVE PROVIDED US, SO IT IS PARTICULARLY IMPORTANT THAT THE SAMPLE BE TRULY REPRESENTATIVE. IN MOST CIRCUMSTANCES YOU WILL BE OBTAINING THE SAMPLE. HOWEVER, IN THOSE CASES IN WHICH WE OBTAIN THE SAMPLE, WE MUST ASK THAT ONE OF YOUR EMPLOYEES BE PRESENT TO DIRECT THE PARTICULAR SOURCE TO BE SAMPLED AND TO WITNESS THE SAMPLING. IN SUCH CASE, YOUR EMPLOYEE MUST SIGN THIS CERTIFICATION AS A WITNESS.

THIS CERTIFICATION MUST BE RETURNED, WITH THE REPRESENTATIVE WASTE SAMPLE, TO:

Chemical Waste Management
P.O. Box 55
HWY. 17, Mile Marker 163
Emelle, Alabama 35459

THE UNDERSIGNED CERTIFIES THAT HE/SHE OBTAINED A REPRESENTATIVE SAMPLE OF THE WASTE MATERIAL DESCRIBED IN THE "GENERATOR'S WASTE MATERIAL PROFILE SHEET" ABOVE REFERENCED, AND THAT THE FOLLOWING REPRESENTATIONS ARE TRUE AND CORRECT:

1. HOUR AND DATE OF SAMPLING: 13:00, 5 Aug. 85
2. SOURCE FROM WHICH SAMPLE TAKEN: Oil Contaminated Soil At North Side Of Used Oil Drum Storage Area
3. EQUIPMENT AND SAMPLING METHOD USED: Random 5 Point Composite Of Surface Soil, Sampled To Depth Of About One Inche At Each Point, Sample Added To Container And Thoroughly Mixed With Preceding Samples Before Adding Another
4. AMOUNT OF SAMPLE OBTAINED: Approx. 800 - 900 cc
5. TYPE OF CONTAINER INTO WHICH SAMPLE WAS PLACED: Nalgene Polyethylene Wide Mouth Bottle.
6. THE SAMPLING EQUIPMENT USED, AND THE CONTAINER INTO WHICH THE SAMPLE WAS PLACED, WERE THEMSELVES UNCONTAMINATED BEFORE USE. Yes.
7. AT THE TIME OF SAMPLING I AFFIXED A LABEL TO THE CONTAINER IN THE FOLLOWING FORM WITH THE FOLLOWING INFORMATION (FILL IN THIS PORTION, INCLUDING YOUR SIGNATURE, JUST AS IT APPEARS ON THE LABEL YOU PREPARED):

RCRA Non-Hazardous Oil Contaminated Soil.

GENERATOR: Hercules Inc.
WASTE NAME: Oil Contaminated Soil - RCRA Nonhazardous
SAMPLE HOUR/DATE: 13:00, 5 Aug. 85
PROFILE SHEET CODE: MAR E09501
SAMPLER SIGNATURE: Ned E. Downs

WITNESS VERIFICATION: I WAS PERSONALLY PRESENT DURING THE SAMPLING DESCRIBED; I DIRECTED THE WASTE SOURCE TO BE SAMPLED; AND I VERIFY THE INFORMATION ABOVE NOTED.

WITNESS: _____

SIGNATURE: _____

TITLE: _____

EMPLOYER: _____

DATE: _____

SAMPLER NAME: Ned E. Downs

SIGNATURE: Ned E. Downs

TITLE: Environmental Coordinator

EMPLOYER: Hercules Inc. - Oxford.

DATE: 5 Aug. 85

LABORATORY REVIEW OF SAMPLING PROTOCOL.

BASED UPON MY REVIEW OF THE ABOVE PROFILE SHEET, I CONCLUDE THAT THE ABOVE METHODOLOGY IS:

☐ ADEQUATE FOR YIELDING A REPRESENTATIVE SAMPLE.

☐ INADEQUATE FOR THE REASONS NOTED HEREON.

DATE: _____

LAB MGR: _____

FORM WMI-51 (Rev. 8/83)

Waste Management, Inc.

GENERATOR'S WASTE MATERIAL PROFILE SHEET

TSDR

E09501

A GENERAL INFORMATION Lube Oil Contaminated Soil, RCRA Nonhazardous Waste

GENERATOR NAME: Hercules Inc.

TRANSPORTER: Chemical Waste Mgt. Inc.

FACILITY ADDRESS: P.O. Box 9, Oxford GA 30267

TRANSPORTER PHONE: (2_5)652-5721

GENERATOR USEPA I.D. N/A

GENERATOR STATE I.D. GAD008575909

TECHNICAL CONTACT: N. C. E. Evans

TITLE: Environ. Coordinator

PHONE: (404)786-7011

NAME OF WASTE: Oil Contaminated Soil - RCRA Nonhazardous Waste

PROCESS GENERATING WASTE: Used crankcase, gearcase, hydraulic oil. Transfer spills by reclaimer [illegible]

B PHYSICAL CHARACTERISTICS OF WASTE

COLOR: Blackish Red, Clay and Sand.

ODOR: ☐ NONE ☒ MILD ☐ STRONG DESCRIBE: Oily

PHYSICAL STATE @ 70°F: ☐ SOLID ☐ SEMI-SOLID ☐ LIQUID ☐ POWDER — Loose Soil

LAYERS: ?? ☐ MULTILAYERED ☐ BI-LAYERED ☐ SINGLE PHASED

FREE LIQUIDS: ☐ YES ☒ NO VOLUME ____ %

pH: ☐ < 2 ☐ 2-4 ☐ 4.1-6.9 ☐ 7 ☐ 7.1-10 ☐ 10.1-12.5 ☐ > 12.5 ☐ EXACT ____ ☒ N/A ?

SPECIFIC GRAVITY: ☐ < .8 ☐ .8-1.0 ☐ 1.1-1.2 ☐ EXACT ____ Est. ☒ 1.3-1.4 ☐ 1.5-1.7 ☐ > 1.7

FLASH POINT: ☐ < 70°F ☐ 70°F-100°F ☐ 101°F-139°F ☐ 140°F-200°F Est ☒ > 200°F ☐ NO FLASH ☐ EXACT ____ ☐ CLOSED CUP ☐ OPEN CUP

C CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%)

Oil contaminated soil is contaminated by used crankcase oil, oil removed from gearboxes, hydraulic oil. No known PCB's present.

D METALS ☐ TOTAL (PPM) ☐ EPA EXTRACTION PROCEDURE (mg/L)

ARSENIC (As)		SELENIUM (Se)	
BARIUM (Ba)		SILVER (Ag)	
CADMIUM (Cd)		COPPER (Cu)	
CHROMIUM (Cr)		NICKEL (Ni)	
MERCURY (Hg)		ZINC (Zn)	
LEAD (Pb)		THALLIUM (Tl)	
CHROMIUM-HEX (Cr + 6)			

E OTHER COMPONENTS - TOTAL (PPM)

CYANIDES		PCB'S	
SULFIDES		PHENOLICS	

F SHIPPING INFORMATION

D.O.T. HAZARDOUS MATERIAL? ☐ YES ☒ NO

PROPER SHIPPING NAME: Lube Oil Contaminated Soil

HAZARD CLASS: N/A I.D. NO.: N/A R.Q.: N/A

METHOD OF SHIPMENT: ☐ BULK LIQUID ☐ BULK SOLID probably → ☒ DRUM (TYPE/SIZE) 55 Gal. Knivel. Tops.

ANTICIPATED VOLUME: ____ GALS. [illegible] CUBIC YARDS OTHER: 10 to 15 drums

PER: ☒ ONE TIME ☐ WEEK ☐ MONTH ☐ QUARTER ☐ YEAR ☐ ____

G HAZARDOUS CHARACTERISTICS RCRA Nonhazardous

REACTIVITY: ☐ NONE ☐ PYROPHORIC ☐ SHOCK SENSITIVE ☐ EXPLOSIVE ☐ WATER REACTIVE ☐ OTHER ____

OTHER HAZARDOUS CHARACTERISTICS: ☐ NONE ☐ RADIOACTIVE ☐ ETIOLOGICAL ☐ PESTICIDE MANUFACTURING WASTE ☐ OTHER ____

USEPA HAZARDOUS WASTE? ☐ YES ☒ NO

USEPA HAZARDOUS CODE(S) ____

STATE HAZARDOUS WASTE? ☐ YES ☒ NO

STATE CODE(S) ____

H SPECIAL HANDLING INFORMATION

☐ ADDITIONAL PAGE(S) ATTACHED

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS COMPLETE AND ACCURATE, AND THAT ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

AUTHORIZED SIGNATURE: N. C. E. Evans

TITLE: Environmental Coordinator DATE: 8/5/85

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2000-0404 Expires 7-31-8(

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GAD098539909 Manifest Document No. 000012
2. Page 1 of 1
Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address
Hercules Inc. c/o N.E. Downs
P.O. Box 6
Oxford GA 30267
4. Generator's Phone (404) 786-7011

G. State Manifest Document Number CWMA 245964
H. State Generator's ID

5. Transporter 1 Company Name: Chemical Waste Management Inc.
6. US EPA ID Number: ALD000622464
I. State Transporter's ID
J. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
K. State Transporter's ID
L. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC.
Emelle Facility
Alabama Highway 17 at Mile Marker 163
Emelle, Alabama 35459
10. US EPA ID Number: ALD000622464
M. State Facility's ID
N. Facility's Phone 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. Nitric Acid - 20% Corrosive, D002 NA 1760 CWM Profile Number MARA90392	009	DF	495	G	
b. Sodium Nitrite Mixture Oxidizer, NA 1487 CWM Profile Number MARI53460	025	DM	16320	P	
c. Lube Oil Contaminated Soil (Non-Hazardous) CWM Profile Number MARE09501	008	DM	4987	P	
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above
IIa. - LIQUID
IIb. - SOLID (2 Drums In 85 Gal. Overpaks)
IIc. - SOLID

K. Handling Codes for Wastes Listed Above
a. D81 c. D81
b. D81 d.

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment

Printed/Typed Name: Ned E. Downs - Environmental Coordinator
Signature: Ned E. Downs
Month Day Year: 1/10/92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Melvin Owens (driver)
Signature:
Month Day Year: 1/10/92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Month Day Year

EPA Form 8700-22 (Rev. 4-85) Previous edition is obsolete GENERATOR No. 2 (White A

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

NON HAZARDOUS WASTE

Please print or type. *(Form designed for use on elite (12-pitch) typewriter.)* Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GAD098583909 Manifest Document No. 00002
2. Page 1 of
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: Hercules Inc. c/o N.E. Downs, P.O. Box 8, Oxford GA 30267
4. Generator's Phone (404) 786-7011

A. State Manifest Document Number: CWMA 244932
B. State Generator's ID

5. Transporter 1 Company Name: Chemical Waste Management Inc.
6. US EPA ID Number: ALD000622464
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address: CHEMICAL WASTE MANAGEMENT, INC., Emelle Facility, Alabama Highway 17 at Mile Marker 163, Emelle, Alabama 35459
10. US EPA ID Number: ALD000622464
G. State Facility's ID
H. Facility's Phone: 205/652-9721

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Lube Oil Contaminated Soil (NON-HAZARDOUS) MARE 09501 CWM Profile Number	~~036~~ 022 NED	DM	~~18703~~ 13715 NED	P	Non Hazardous
b. CWM Profile Number					
c. CWM Profile Number					
d. CWM Profile Number					

J. Additional Descriptions for Materials Listed Above

11a. — Solid (Loose Packed Soil)

K. Handling Codes for Wastes Listed Above

a. D81 c.
b. d.

15. Special Handling Instructions and Additional Information

OCT 08 1985

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: Ned E. Downs — Environmental Coordinator
Signature: Ned E. Downs
Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials — Approved for Payment
Printed/Typed Name: Robert ... Briggs
Signature
Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

FACILITY

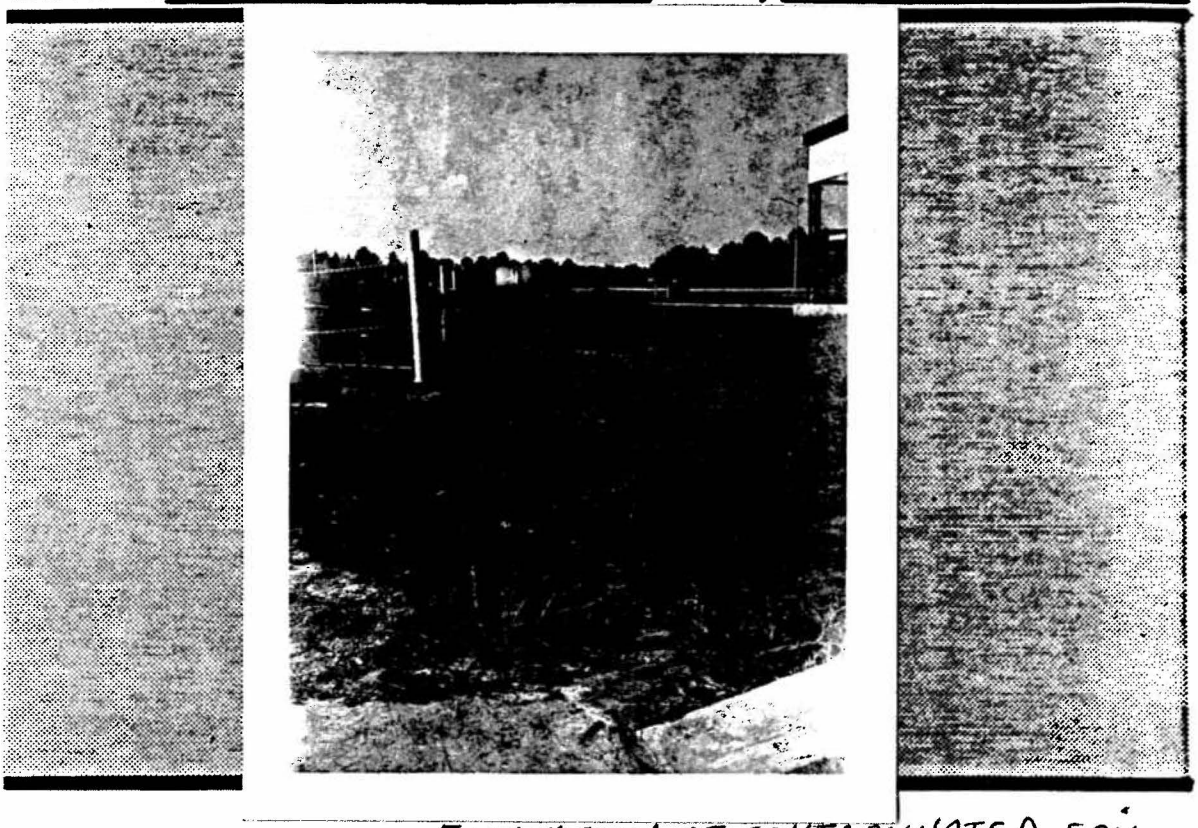
19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Month Day Year

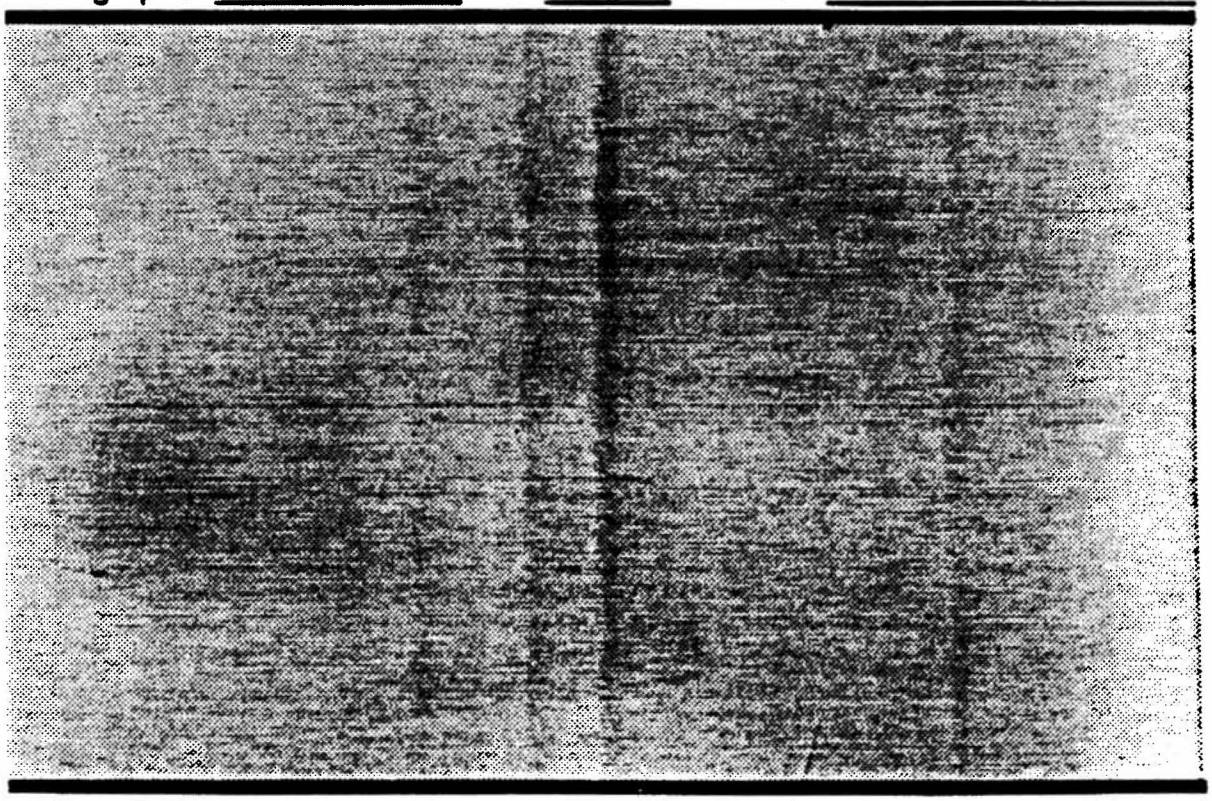
EPA Form 8700-22 (Rev. 4-85) Previous edition is obsolete. FILE COPY (Must Accompany Shipment)

PHOTOGRAPHIC DOCUMENTATION

Site Name: HERCULES, INC. **County:** NEWTON



No. 1 **of** 1 **Description:** ESCAVATION OF CONTAMINATED SOIL AROUND OLD WASTE OIL STORAGE AREA
Photographer: UNKNOWN **Date:** 1985 **Comment:**



No. ____ **of** ____ **Description:** _____
Photographer: _____ **Date:** _____ **Comment:** _____

Georgia Department of Natural Resources
270 Washington Street, S.W., Room 825, Atlanta, Georgia 30334
J. Leonard Ledbetter, Commissioner
Harold F. Reheis, Assistant Director
Environmental Protection Division

FILE COPY

October 15, 1985

Mr. Ned E. Downs
Environmental Coordinator
Hercules Incorporated
P. O. Box 8
Oxford, Georgia 30267

Docket # 22

Re: July 19, 1985 NOV-oil contaminated soil

Dear Mr. Downs:

This will acknowledge receipt of your progress report on clean-up of the oil contaminated soil around the facility's waste oil drum storage area.

We appreciate Hercules' continuing cooperation with the Georgia Environmental Protection Division. Please advise our office when analysis are available and ultimate disposal is completed. If you have any questions, please contact Behrooz Khaleghi at 404/656-2833.

Sincerely,

Bill Mundy

Bill Mundy
Unit Coordinator
Industrial & Hazardous Waste
Management Program

BM/BK:kaw
(0165K)

File: Hercules-Oxford (R)

Georgia Department of Natural Resources
270 Washington Street, S.W., Room 825, Atlanta, Georgia 30334
J. Leonard Ledbetter, Commissioner
Harold F. Reheis, Assistant Director
Environmental Protection Division

November 4, 1985

Docket # 26

FILE COPY

Mr. Ned E. Downs
Environmental Coordinator
Hercules Incorporated
P.O. Box 8
Oxford, Ga. 30267

RE: Compliance Status

Dear Mr. Downs:

This will acknowledge receipt of your report on the completion phase of the clean-up of the oil contaminated soil around the facility's waste oil drum storage area.

The cooperation you have shown is greatly appreciated. If you have any questions, please contact Behrooz Khaleghi at (404) 656-2833.

Sincerely,

Bill Mundy

Bill Mundy
Unit Coordinator
Industrial & Hazardous Waste
Management Program

BM:BK:cm:035
File: Hercules - Oxford Plant (R)

EXHIBIT J

SEPTEMBER 1981 FUEL OIL SPILL DETAILS

HERCULES

Interoffice Memo

SPILLS

cc: B. C. Myhand

Oxford, Georgia
October 7, 1981

DPJ-81-01

TO: W. B. Henderson
Environmental Coordinator

FROM: D. P. Johnson
Utilities Supervisor

SUBJECT: NO. 6 FUEL OIL LEAK

On Saturday, September 5, 1981, the Utility Operator on the 3-11 shift (Wiley Jackson), during his first inspection tour, discovered the fuel oil pump had burst a shaft mechanical seal. This resulted in approximately 3,000 gallons of #6 fuel oil being dumped inside the dyke area. All the fuel oil was contained within the enclosed area.

The cleanup was accomplished by Vacuum Systems Inc. of Austell, Ga. - Mr. Frank Peacock, Manager. The Georgia EPD approved the transport of 4,000 gallons of an oil and water mixture to Troy L. Griffin Oil Inc., Jefferson, Ga., for reclaim. The remaining oil-soaked dirt was approved for landfill disposal by Mr. Clyde Fain, Inspection Office of Sanitary Landfill, State of Georgia. Mr. Roy Varner, Newton County Commissioner, approved the dirt for dumping at the Newton County landfill.

Documents attached:

1) Vacuum Systems Inc. Insurance Certificate

   a) EPA ID #GAT150010312
   b) Purchase Order

2) Transport Manifest, State of Georgia

Douglas P Johnson

DPJ/ck
Attachments

HER 718
PRINTED IN U.S.A.

ENVIRONMENTAL PROTECTION DIVISION
SOLID WASTE MANAGEMENT SECTION
ACTION REPORT

F

10-7-81

FACILITY ID	REGION	COUNTY	HOURS	REVIEWED BY	CODED
GAD098583909 Gen. & TSD Plus Part A	North	Newton	8		

FACILITY NAME Hercules, Inc.

ADDRESS Alcovy Road CITY Covington ZIP 30209

PERSON(S) CONTACTED Doug Johnson TITLE Env. Mgr., Hercules
Frank Peacock Vacuum Systems
Troy Griffith Waste Oil and Morgan Cantrell

TRIP BY Clyde Fehn ACCOMPANIED BY

INVESTIGATION DATE Sept. 8,9, and 11, 1981 FOLLOW-UP DATE Dec. 1, 1981

REFERENCE facility file

PROGRAM ACTIVITY industrial inspection and compliance

ACTIONS	FINDINGS/DECISIONS	NEXT ACTIONS
44 telephone discussions	87 supply assistance	34 initial facility investigation

COMMENTS, CONCLUSIONS, AND RECOMMENDATIONS:

1. Mr. Frank Peacock called to report that he was assisting O & H Materials in the cleanup of an oil-water spill at Hercules, Inc. The spill involved 8000 gallons, containing about 3,000 gallons of #6 fuel oil and 5000 gallons of water. There was some sand contaminated with oil.

2. For disposal of the oil and water mixture, I referred them to Troy Griffith Waste Oil. Checking later, Mr. Griffith reported that three loads of this mixture was delivered to his facility.

3. Later, Mr. Peacock called and wanted to take the oil-contaminated sand to Crymes SLF. Mr. Morgan Cantrell would not approve this, but suggested the use of the Newton County SLF. This information was relayed to Mr. Peacock.

4. All aspects were discussed with Mr. Doug Johnson at Hercules.

Recommendations and Follow-Up Required: Send NOV

Photographs: None

Reviewed By: [signature]

Attachments: None

GM:bpk:0034M

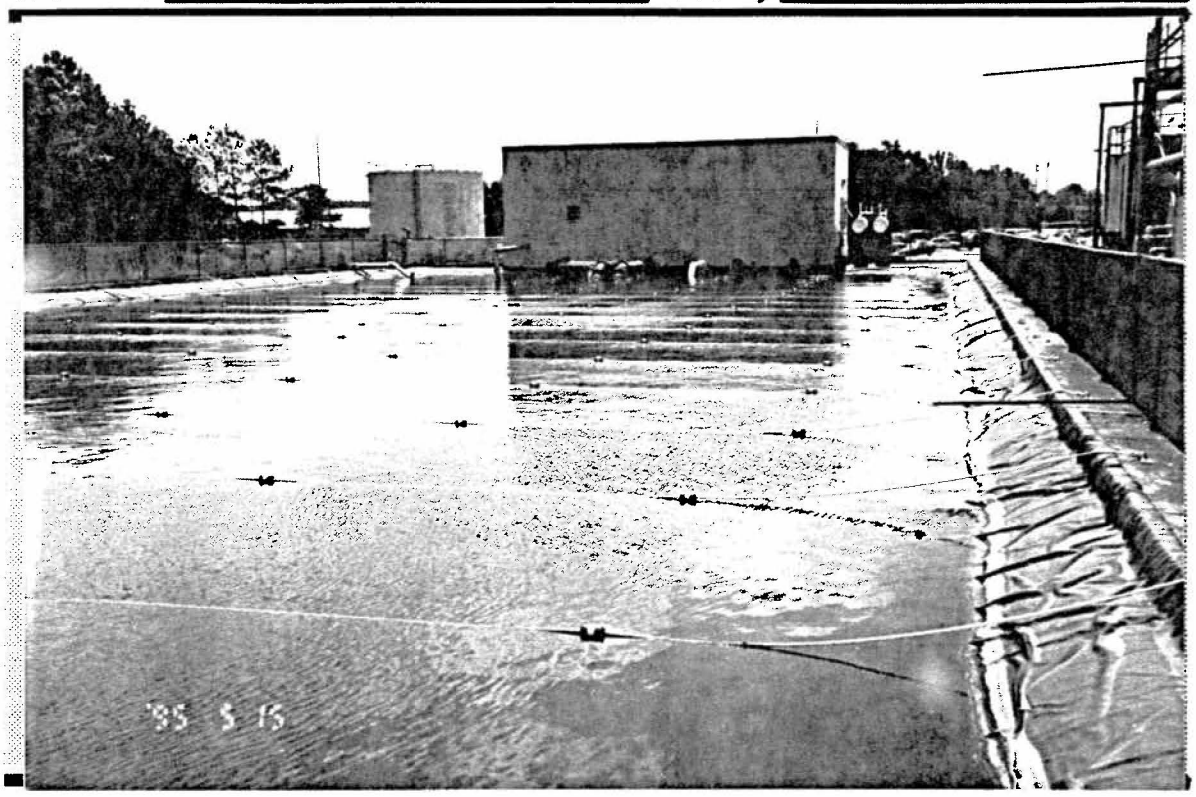
File: Hercules Oxford Plant (R)

APPENDIX A

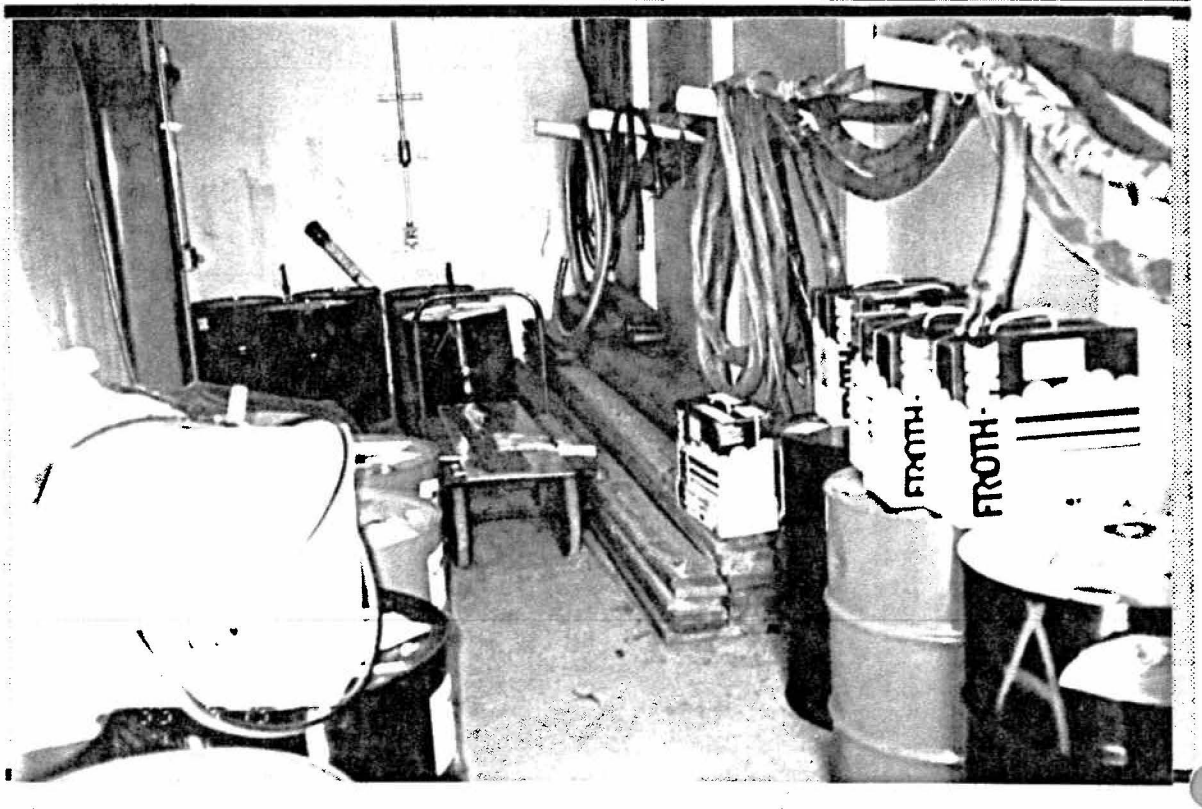
PHOTOGRAPHIC LOG

PHOTOGRAPHIC DOCUMENTATION

Site Name: HERCULES INC. **County:** NEWTON



No. 1 **of** 31 **Description:** FIRE POND
Photographer: S. WHITE **Date:** 5-15-85 **Comment:**



No. 2 **of** 31 **Description:** ROOFING STORAGE BUILDING
Photographer: S. WHITE **Date:** 5-15-85 **Comment:**

PHOTOGRAPHIC DOCUMENTATION

Site Name: HERCULES INC. **County:** NEWTON

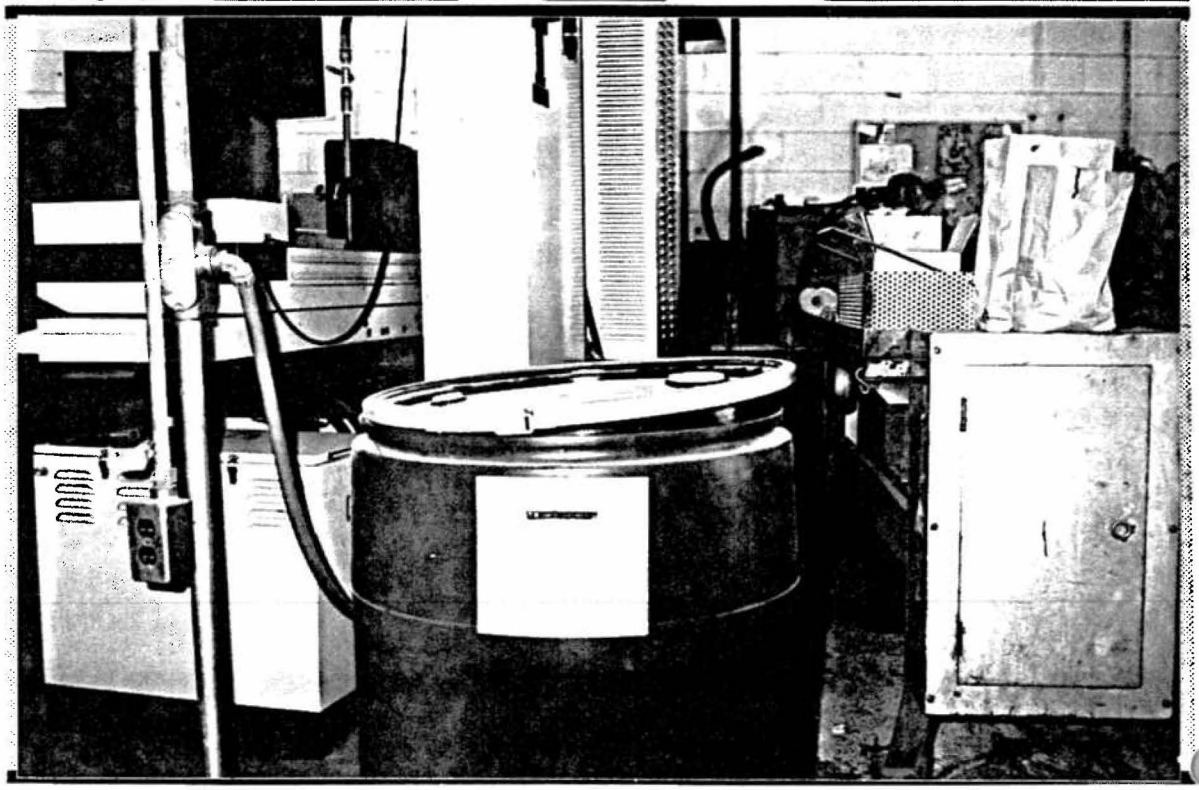
No. 3 **of** 31 **Description:** RAILCARS AND SILOS
Photographer: L. AJANAKU **Date:** 5-10-95 **Comment:**

No. 4 **of** 31 **Description:** SILO which stores polyprophlene
Photographer: L. AJANAKU **Date:** 5-10-95 **Comment:**

PHOTOGRAPHIC DOCUMENTATION

Site Name: HERCULES INC. **County:** NEWTON

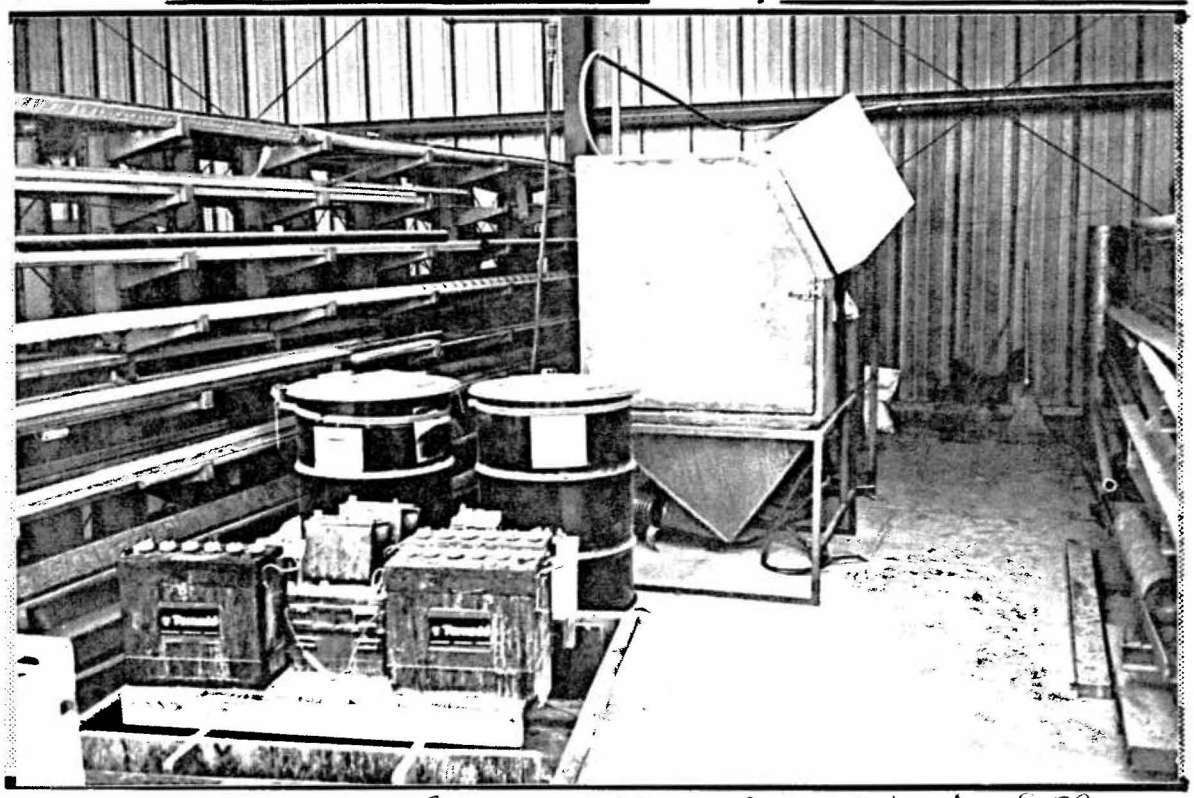
No. 5 **of** 31 **Description:** MAINTENANCE SHOP
Photographer: L. AJANAKU **Date:** 5-10-95 **Comment:**



No. 6 **of** 31 **Description:** Accummulation container in MAINTENANCE SH
Photographer: L. AJANAKU **Date:** 5 10-95 **Comment:** USED RAGS ACCUM.

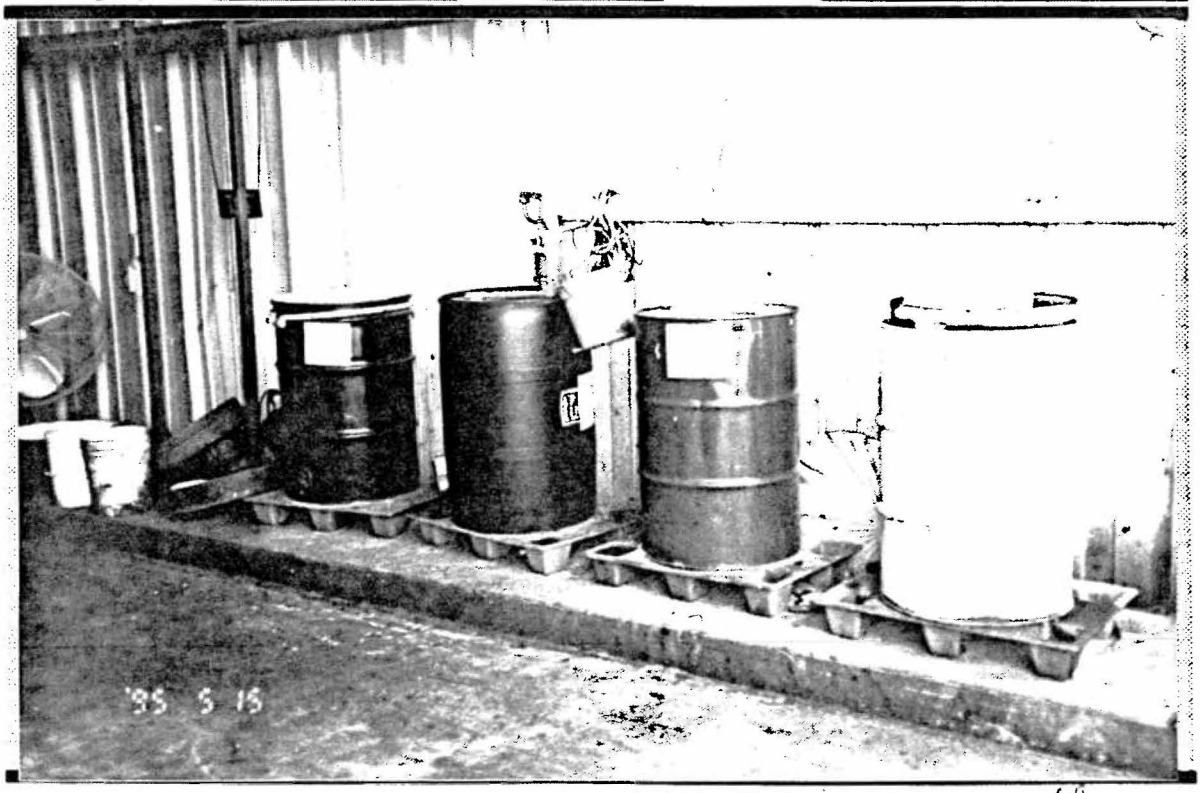
PHOTOGRAPHIC DOCUMENTATION

Site Name: _____ **County:** _____



SATELITE ACCUM. point outside of MAINTENANCE

No. 7 **of** 31 **Description:** Shop for used oil. used batteries & empty
Photographer: L. Ajanaku **Date:** 5-16-95 **Comment:** aerasol cans.

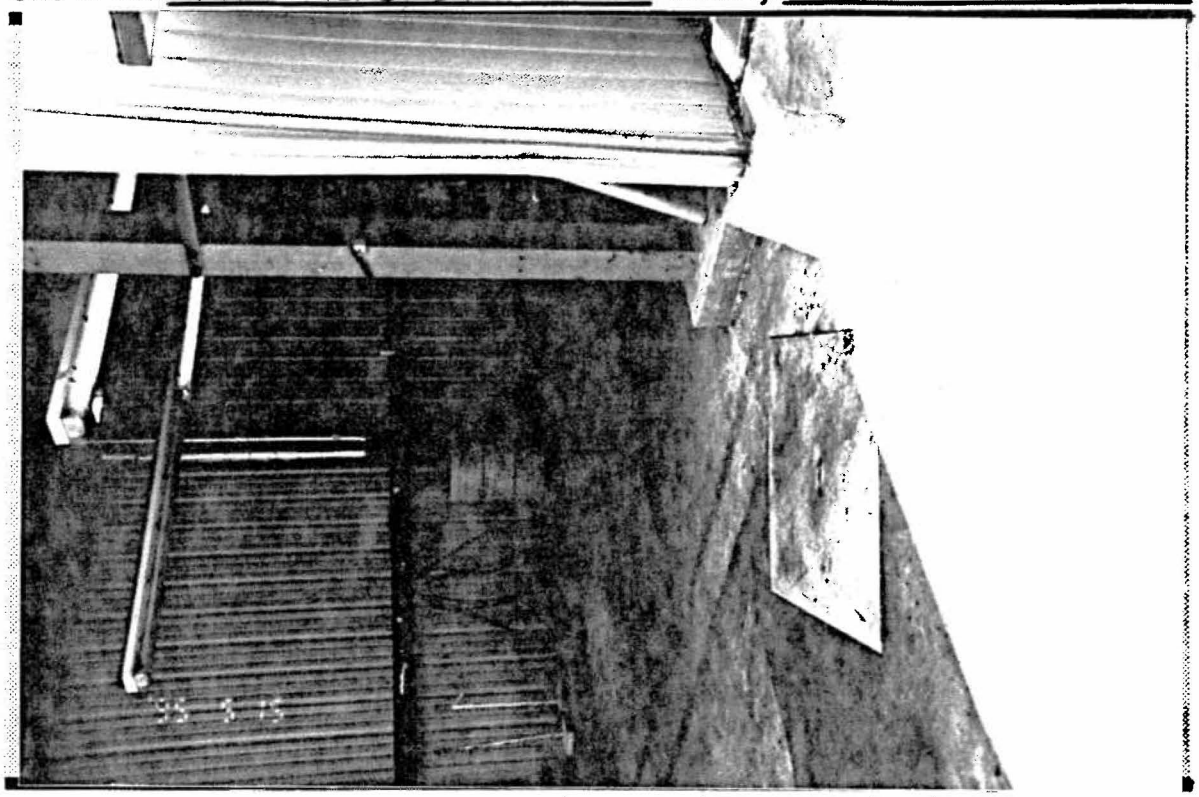


SATELITE ACCUM. POINT OUTSIDE MAINTENANCE

No. 8 **of** 31 **Description:** Shop for used oil.
Photographer: S WHITE **Date:** 5-15-95 **Comment:** _____

PHOTOGRAPHIC DOCUMENTATION

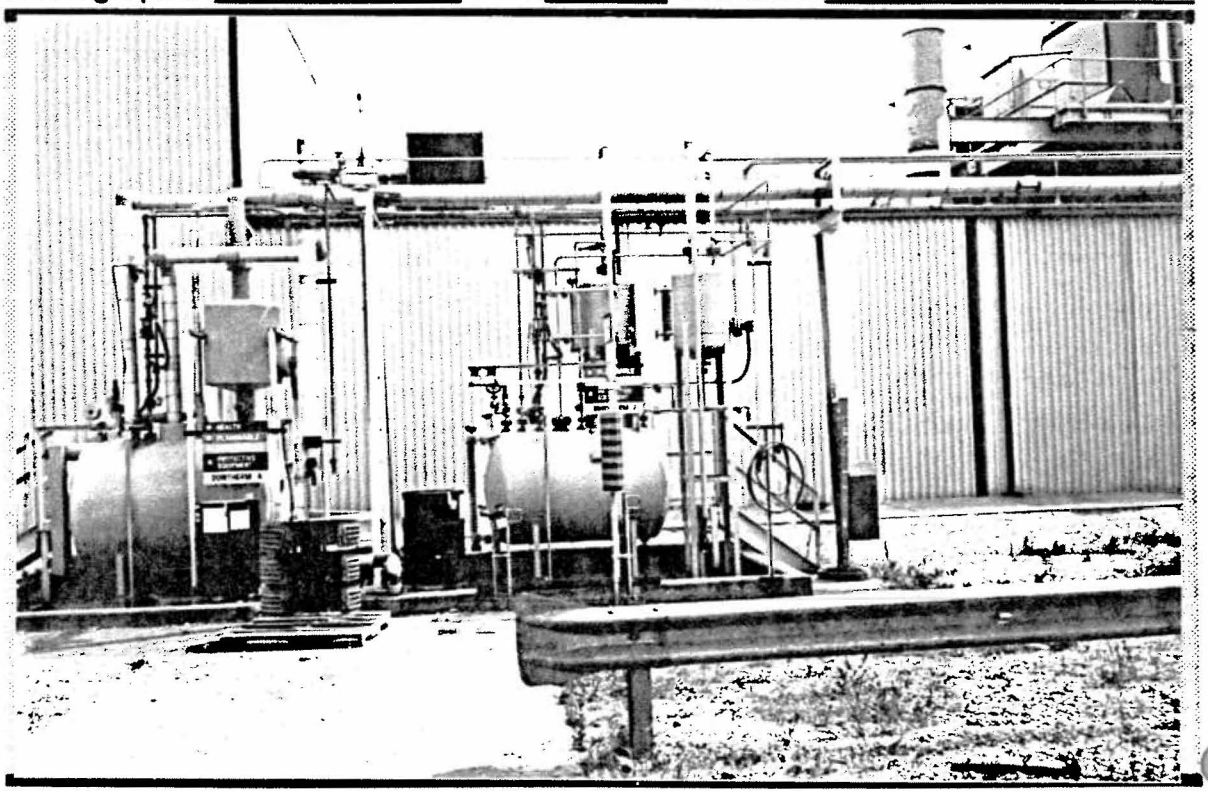
Site Name: HERCULES INC. **County:** NEWTON



250 gallon underground storage tank use

No. 10 **of** 31 **Description:** as oil water seperator

Photographer: S. White **Date:** 5-15-95 **Comment:**

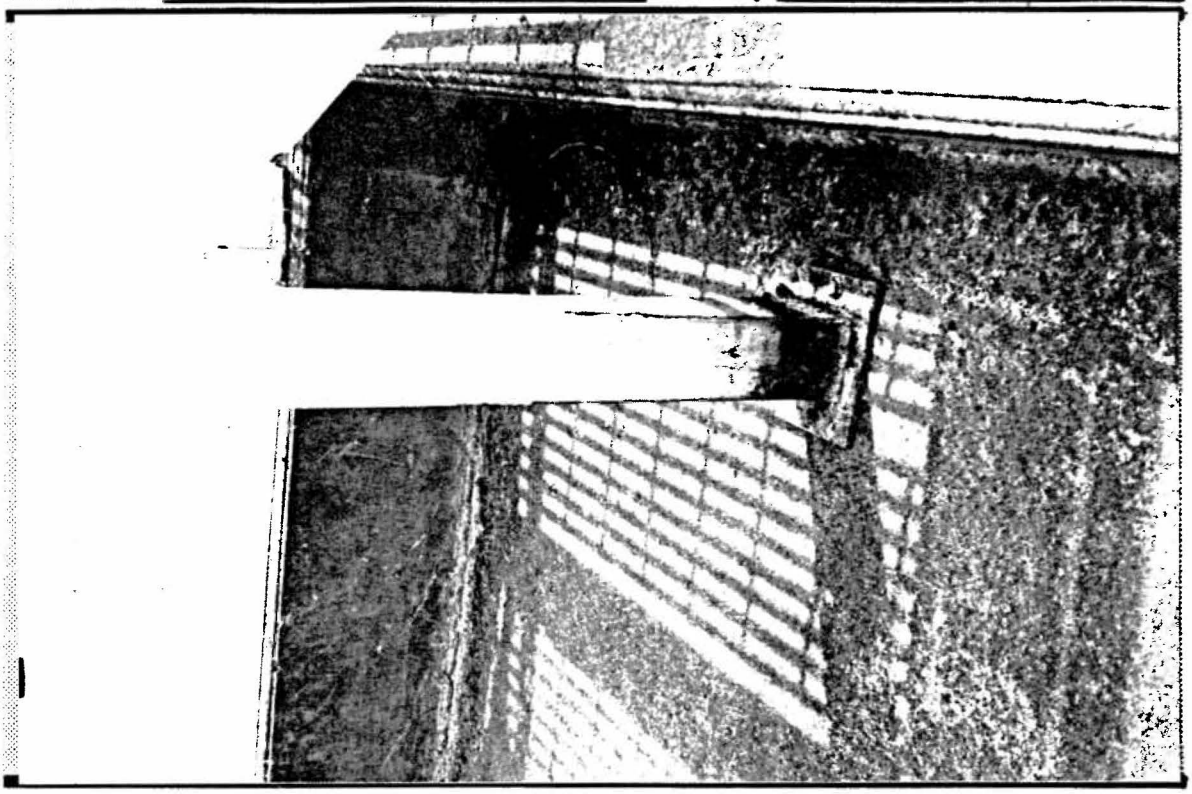


No. 10a **of** 31 **Description:** Dowtherm J Tank Farm

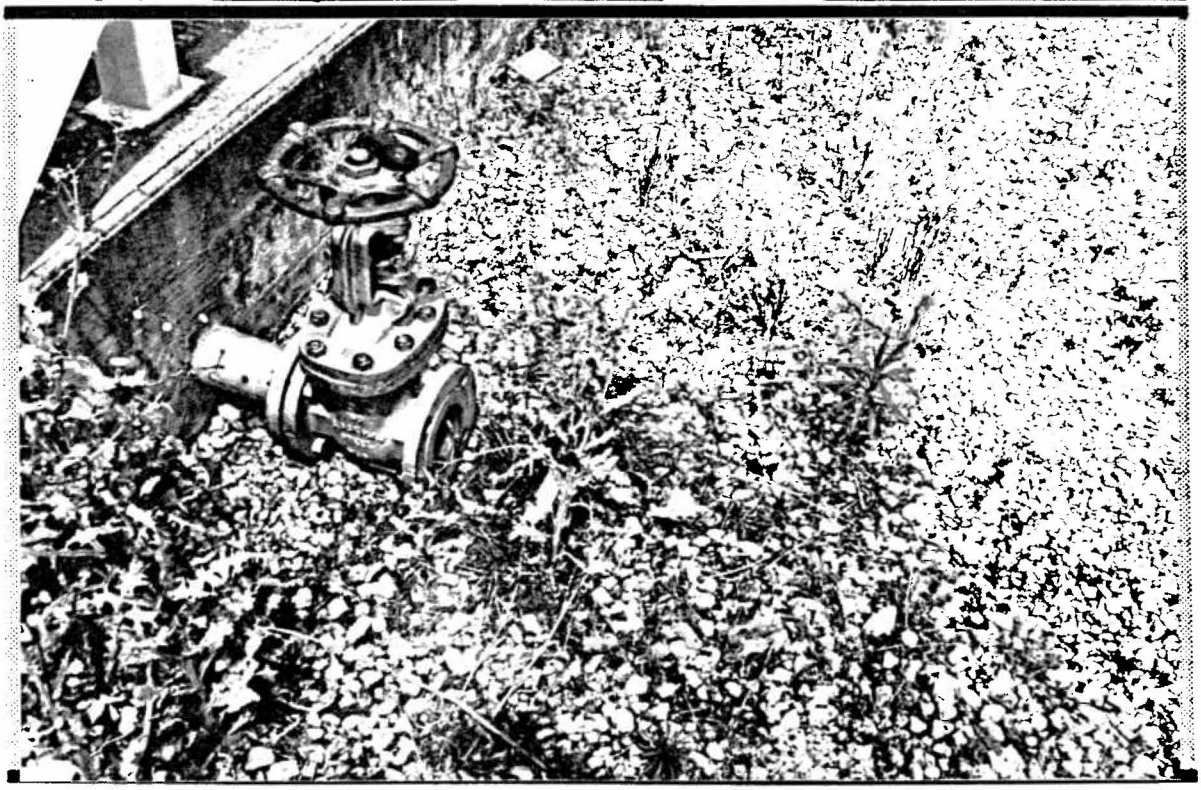
Photographer: L AJANAKU **Date:** 5-10-95 **Comment:**

PHOTOGRAPHIC DOCUMENTATION

Site Name: Hercules, Inc. **County:** Newton



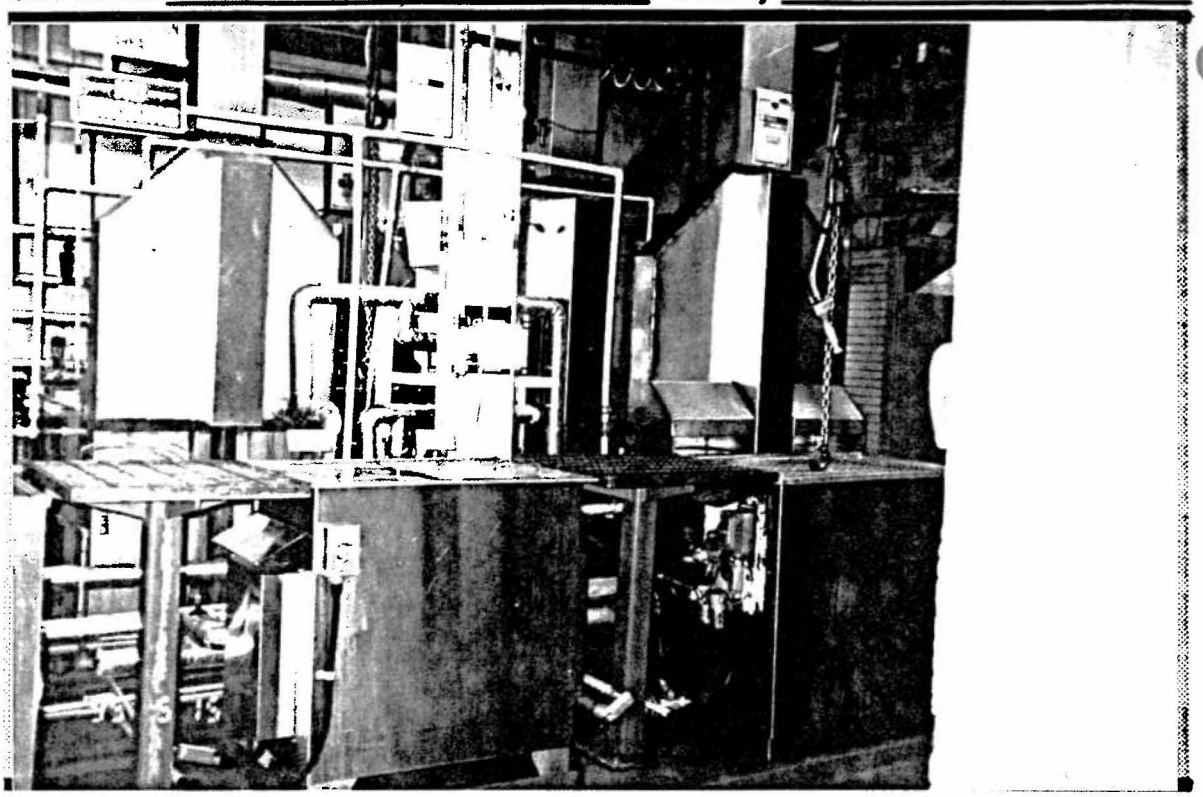
No. 11 **of** 31 **Description:** Drain in Dowtherm J Tank Farm
Photographer: L. Ajanaku **Date:** 5-10-95 **Comment:** There are 2 drains



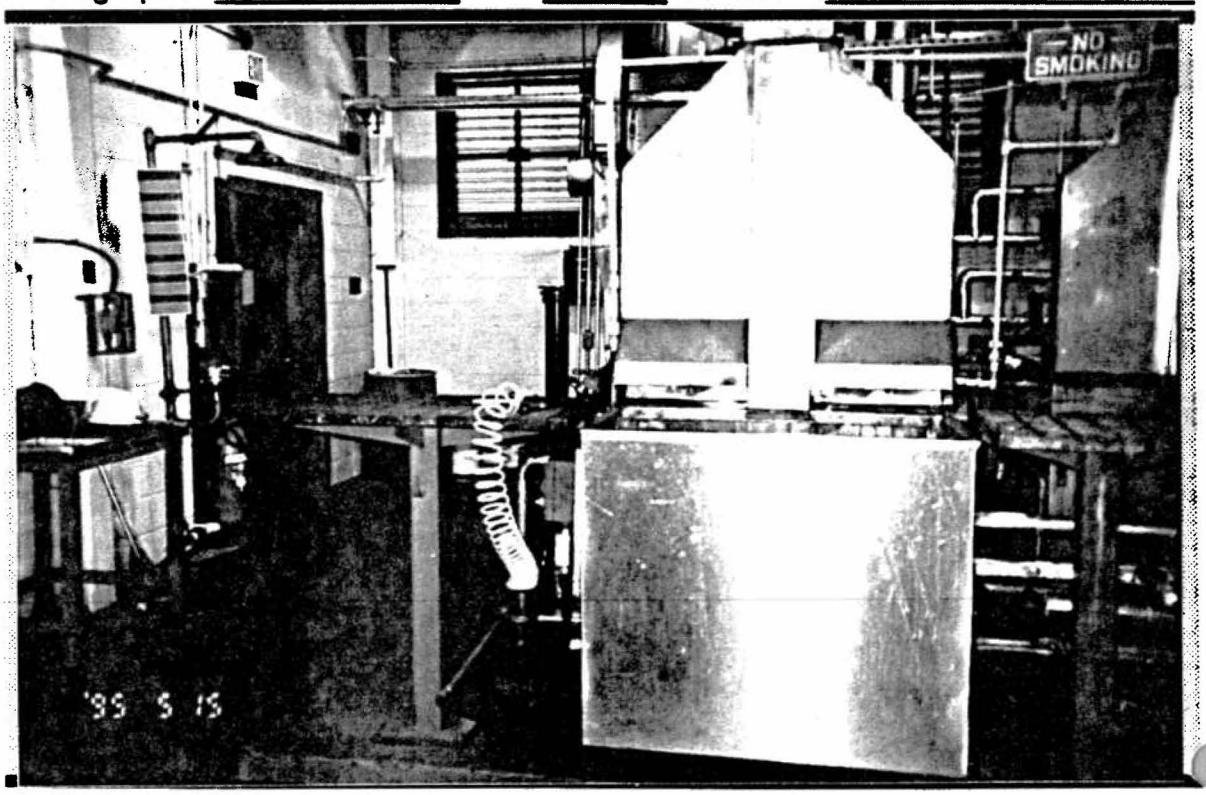
No. 12 **of** 31 **Description:** Locked valve at Dowtherm J Tank Farm
Photographer: L. Ajanaku **Date:** 5-10-95 **Comment:** There are 2 valves

PHOTOGRAPHIC DOCUMENTATION

Site Name: Hercules, Inc. **County:** NEWTON



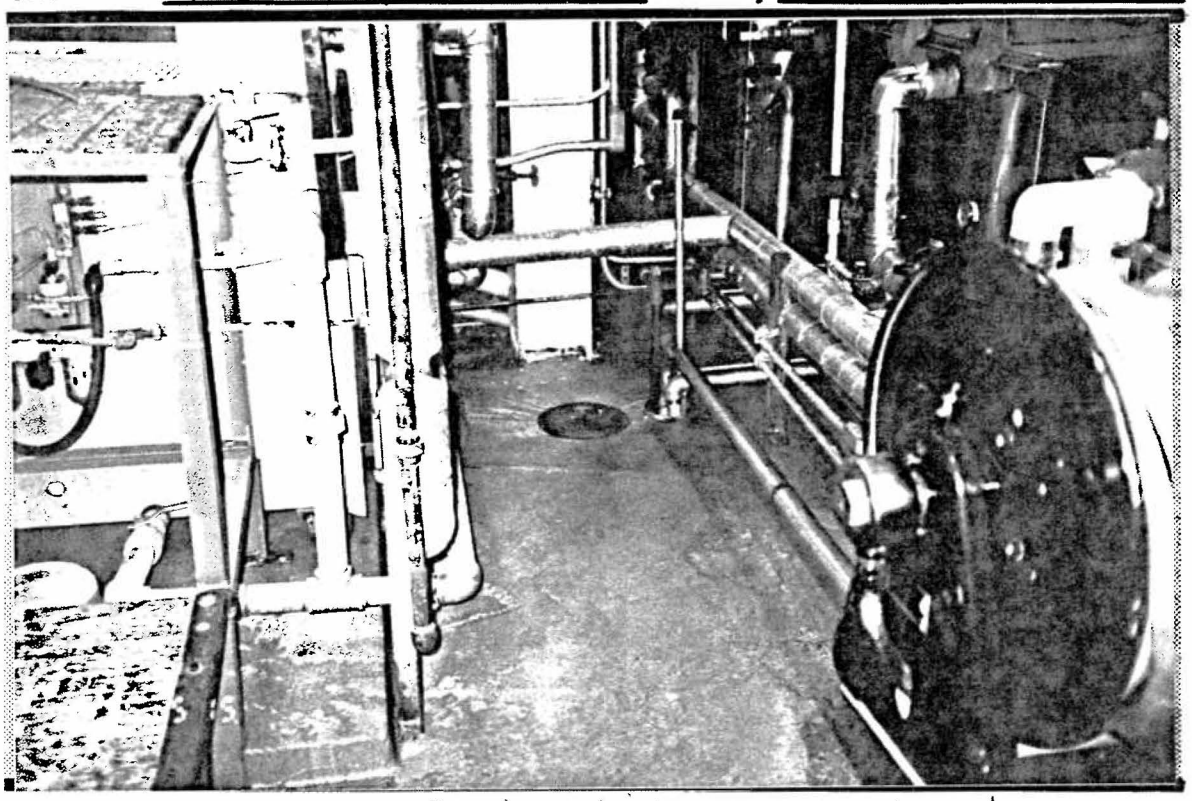
No. 13 **of** 31 **Description:** Salt Pot Room
Photographer: S. White **Date:** 5-15-95 **Comment:**



No. 14 **of** 31 **Description:** Salt Pot Room
Photographer: S. White **Date:** 5-15-95 **Comment:**

PHOTOGRAPHIC DOCUMENTATION

Site Name: Hercules, Inc. **County:** Newton



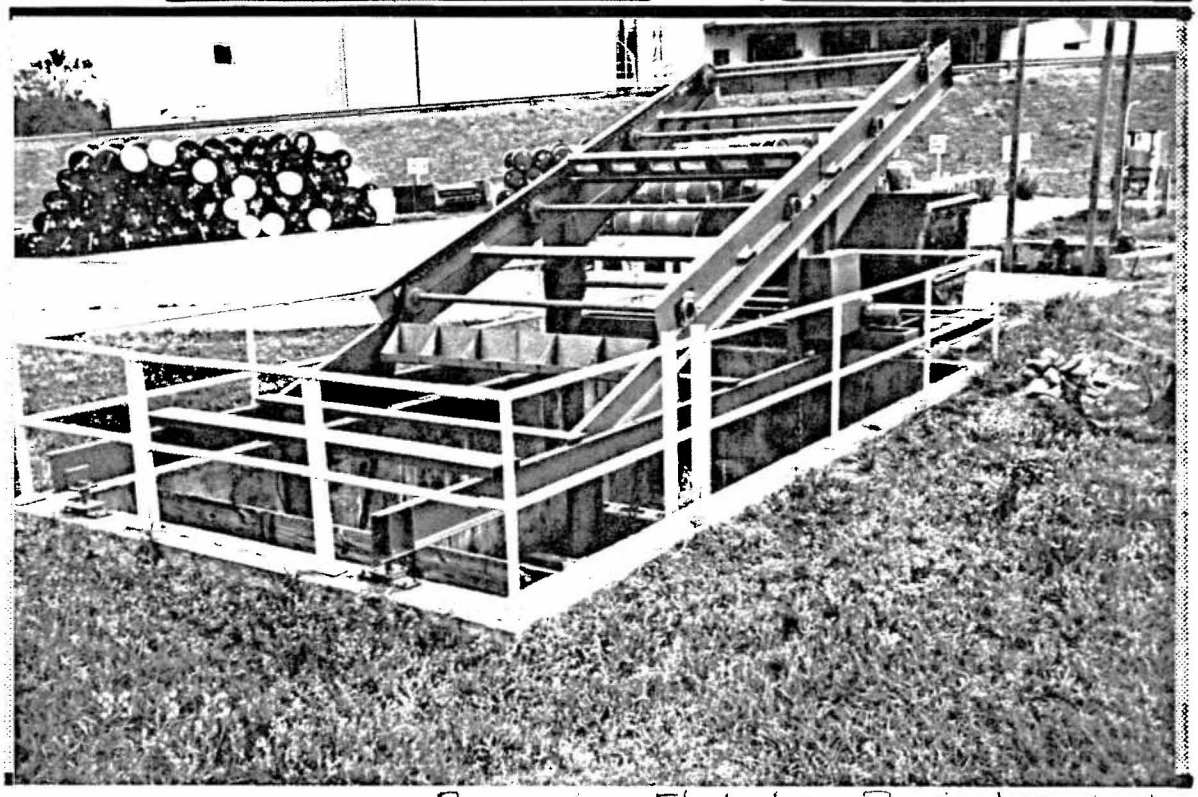
Drain which was replaced in the Salt Pot Room

No. 15 **of** 31 **Description:**
Photographer: S. White **Date:** 5-15-95 **Comment:**

No. 16 **of** 31 **Description:** Process Water Outfall (POTW)
Photographer: S White **Date:** 5-15-95 **Comment:**

PHOTOGRAPHIC DOCUMENTATION

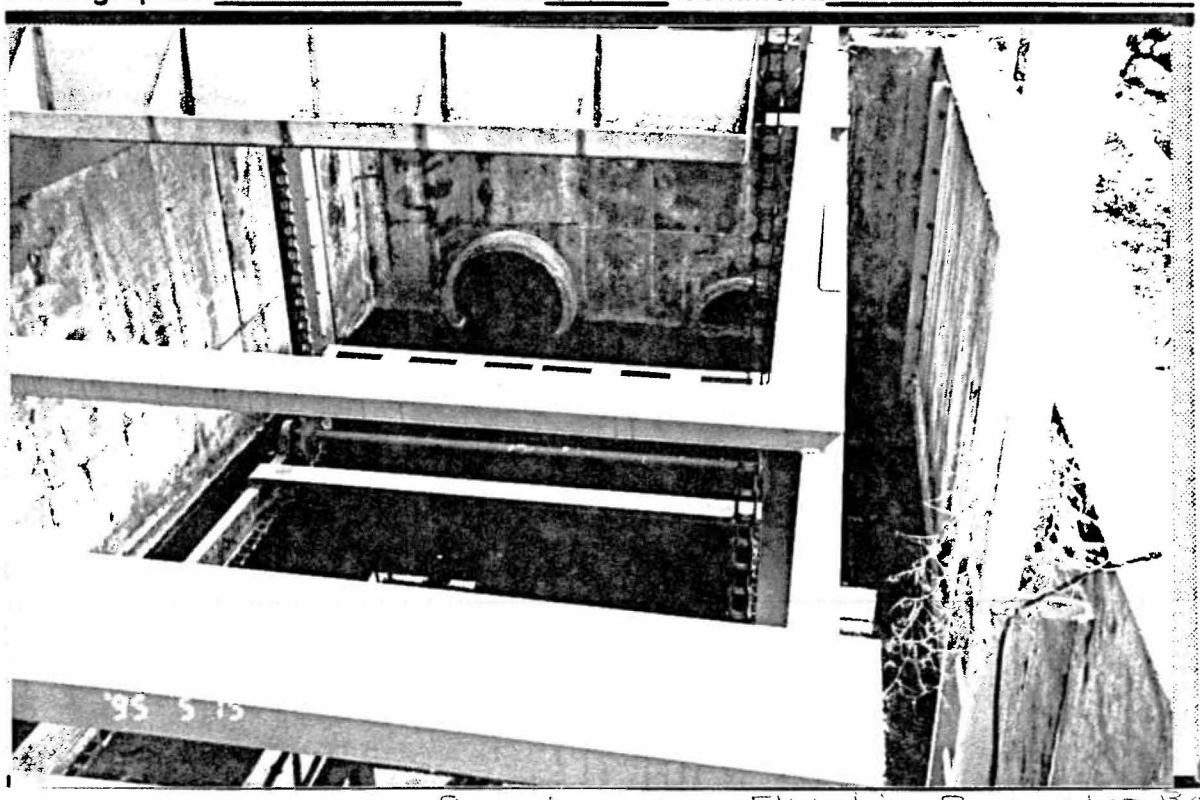
Site Name: Hercules Inc. **County:** Newton



Rainwater Flotation Basin located

No. 17 **of** 31 **Description:** southwest of the Container Storage Bldg

Photographer: S. White **Date:** 5-15-95 **Comment:**



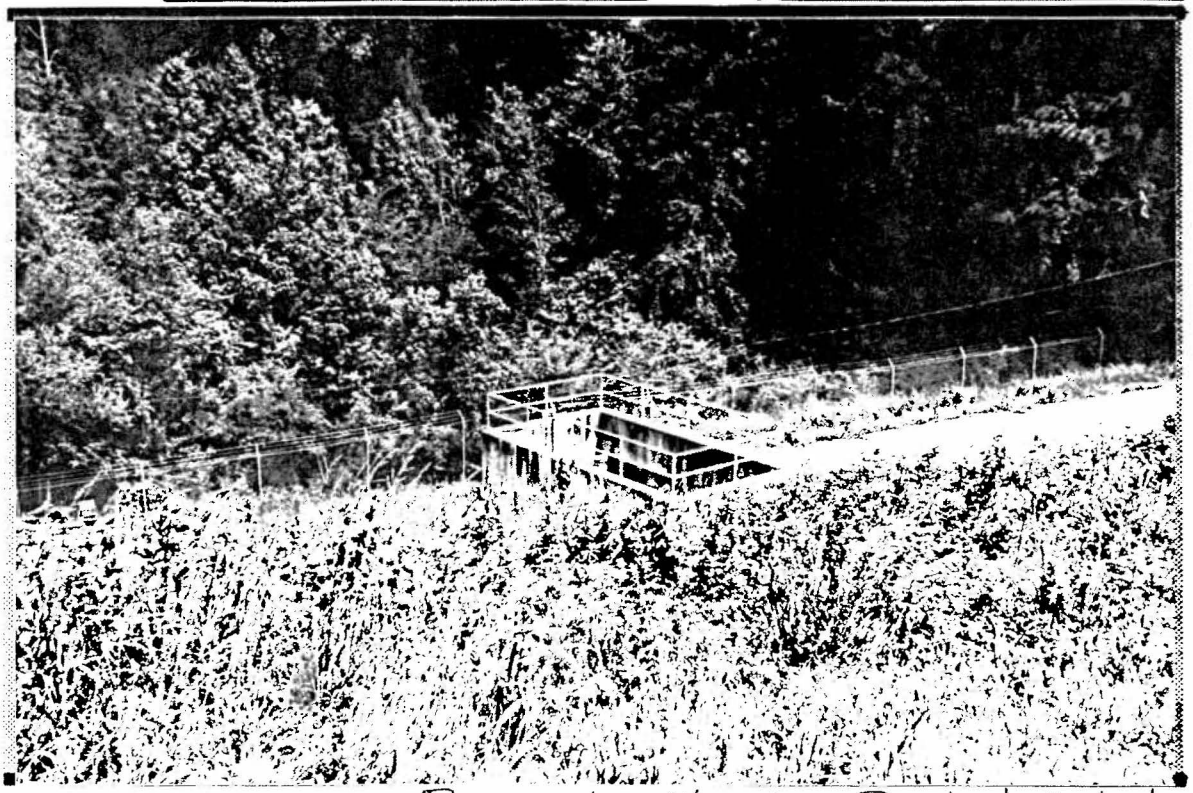
Second view of Flotation Rainwater Basin

No. 18 **of** 31 **Description:** shown in photo. 17.

Photographer: S. White **Date:** 5-15-95 **Comment:**

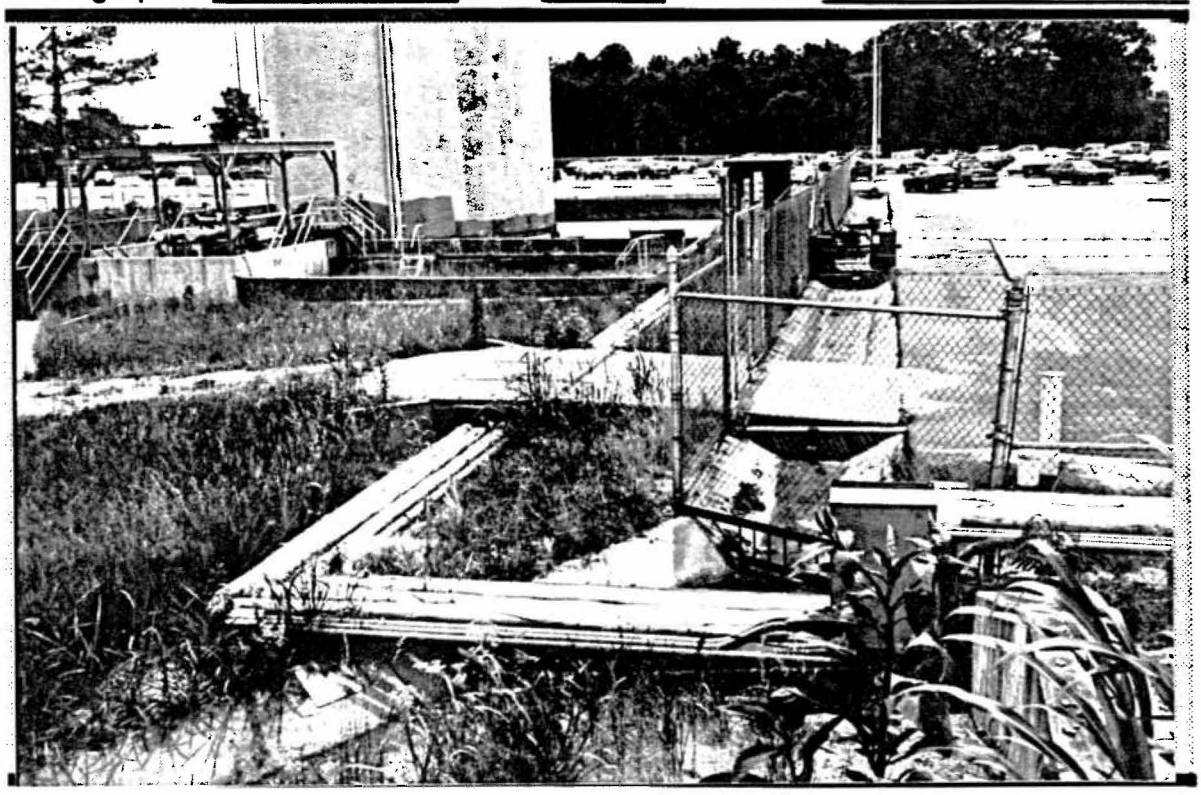
PHOTOGRAPHIC DOCUMENTATION

Site Name: Hercules, Inc. **County:** Newton



Rainwater Flotation Basin located

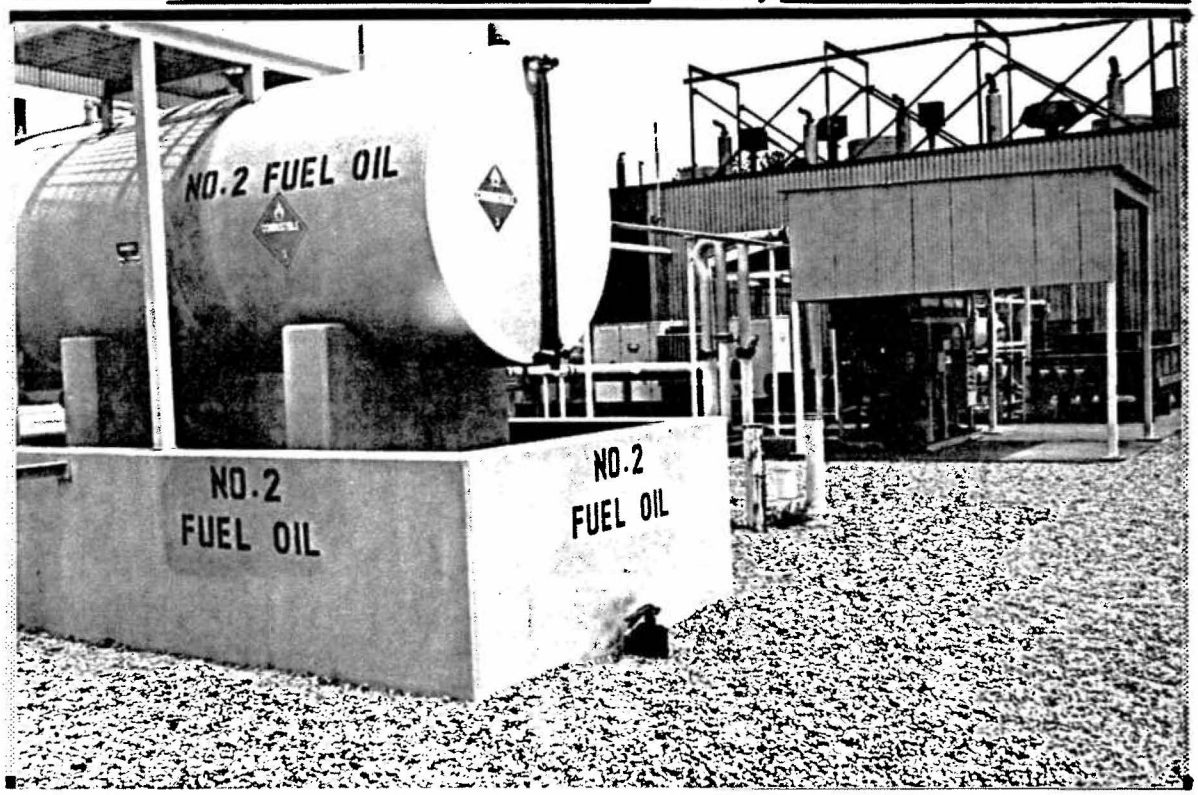
No. 19 **of** 31 **Description:** North of Plant I.
Photographer: S. White **Date:** 5-15-95 **Comment:**



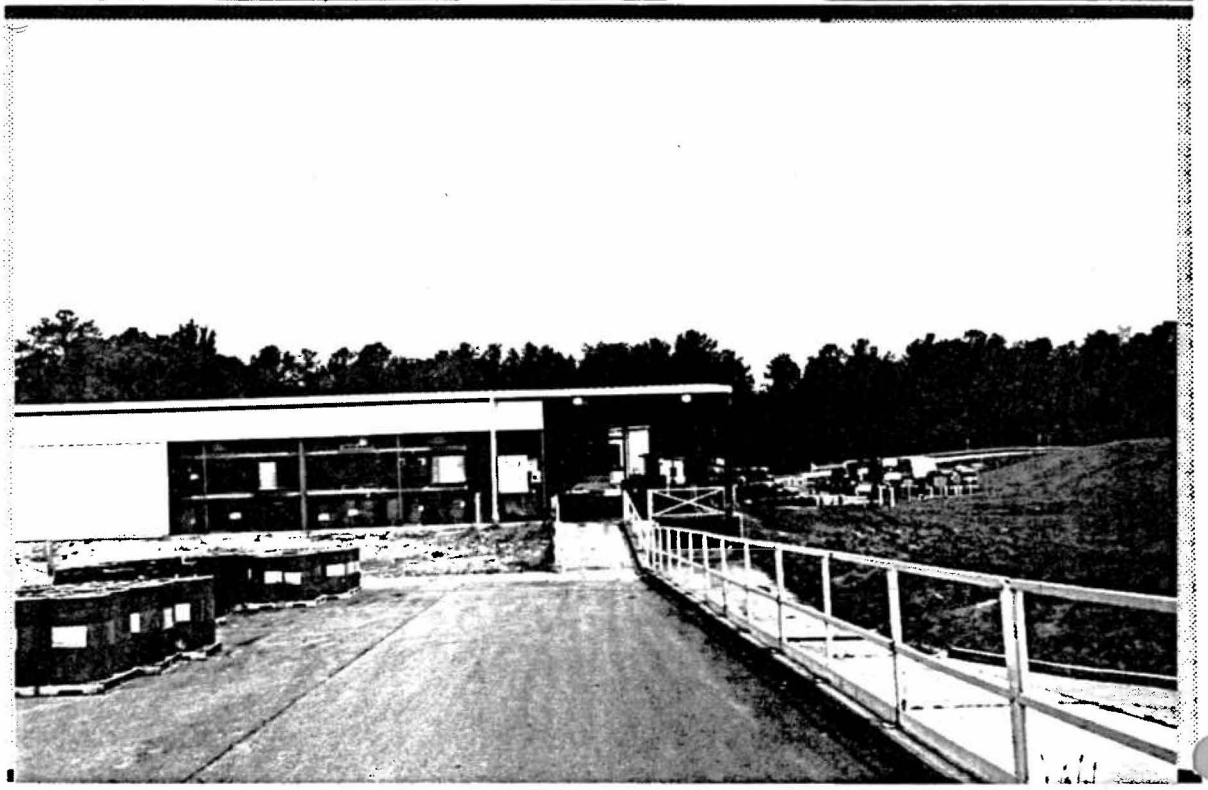
No. 20 **of** 31 **Description:** #6 Fuel oil storage tank
Photographer: L. Ajanaku **Date:** 5-10-95 **Comment:**

PHOTOGRAPHIC DOCUMENTATION

Site Name: Hercules **County:** Newton



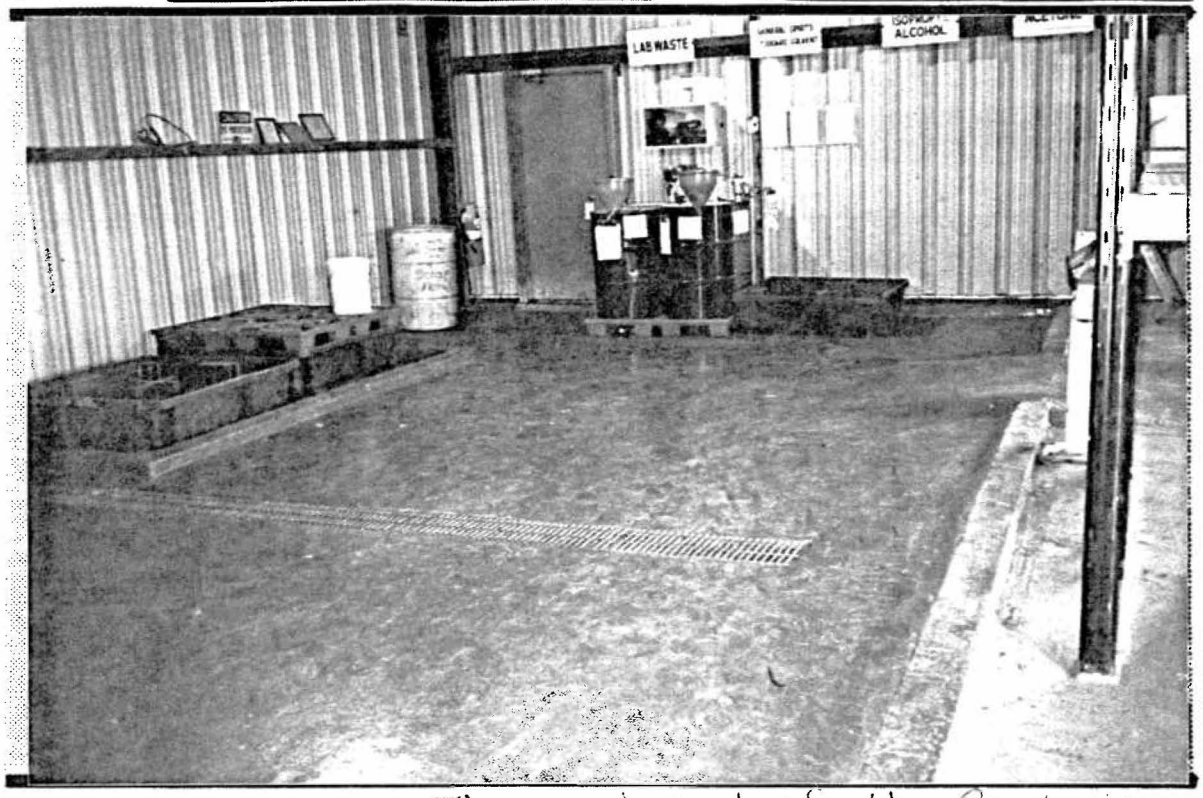
No. 21 **of** 31 **Description:** #2 Fuel oil storage tank
Photographer: L. Ajanaku **Date:** 5-10-95 **Comment:**



No. 22 **of** 31 **Description:** Container Storage Bldg
Photographer: L. Ajanaku **Date:** 5-10-95 **Comment:**

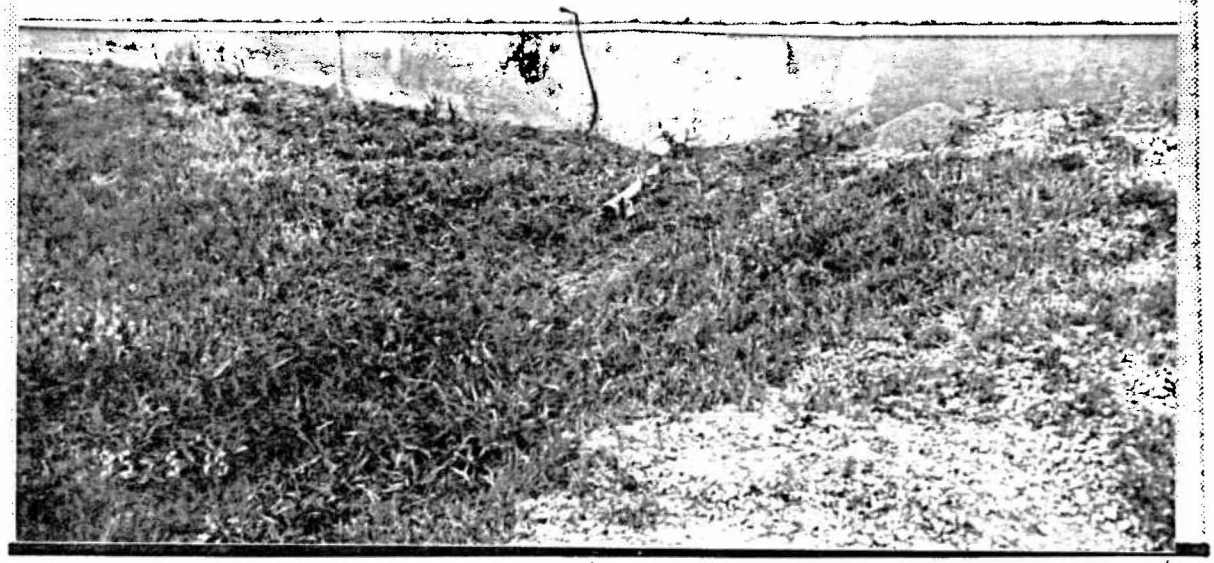
PHOTOGRAPHIC DOCUMENTATION

Site Name: Hercules **County:** Newton



The west end of the Container

No. 23 **of** 31 **Description:** Storage Bldg
Photographer: L. Aianaka **Date:** 5-16-95 **Comment:**



Valves located on west end outside

No. 24 **of** 31 **Description:** the Container Storage Bldg
Photographer: S. White **Date:** 5-15-95 **Comment:**

PHOTOGRAPHIC DOCUMENTATION

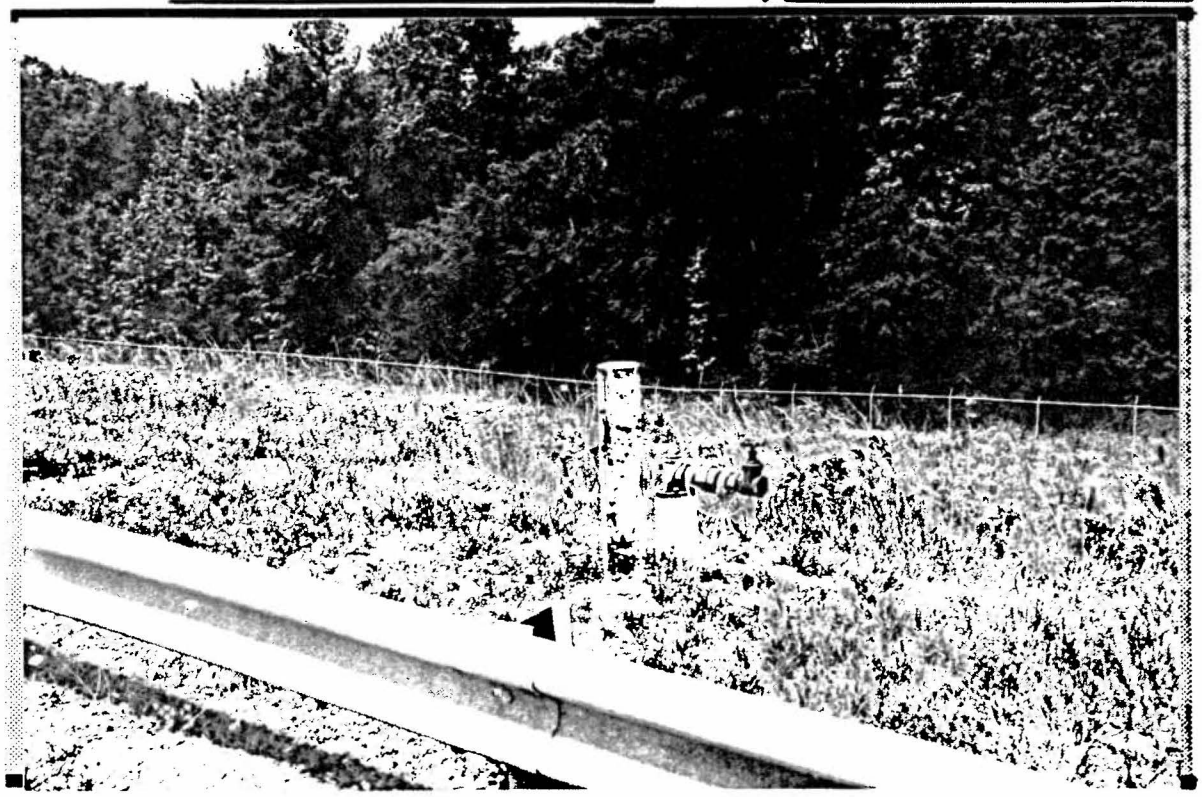
Site Name: Hercules **County:** Newton

No. 25 **of** 31 **Description:** Well #2 (See Figure 6)
Photographer: S. White **Date:** 5-15-95 **Comment:**

No. 26 **of** 31 **Description:** Well #6 (See Figure 6)
Photographer: S. White **Date:** 5-15-95 **Comment:**

PHOTOGRAPHIC DOCUMENTATION

Site Name: Hercules **County:** Newton

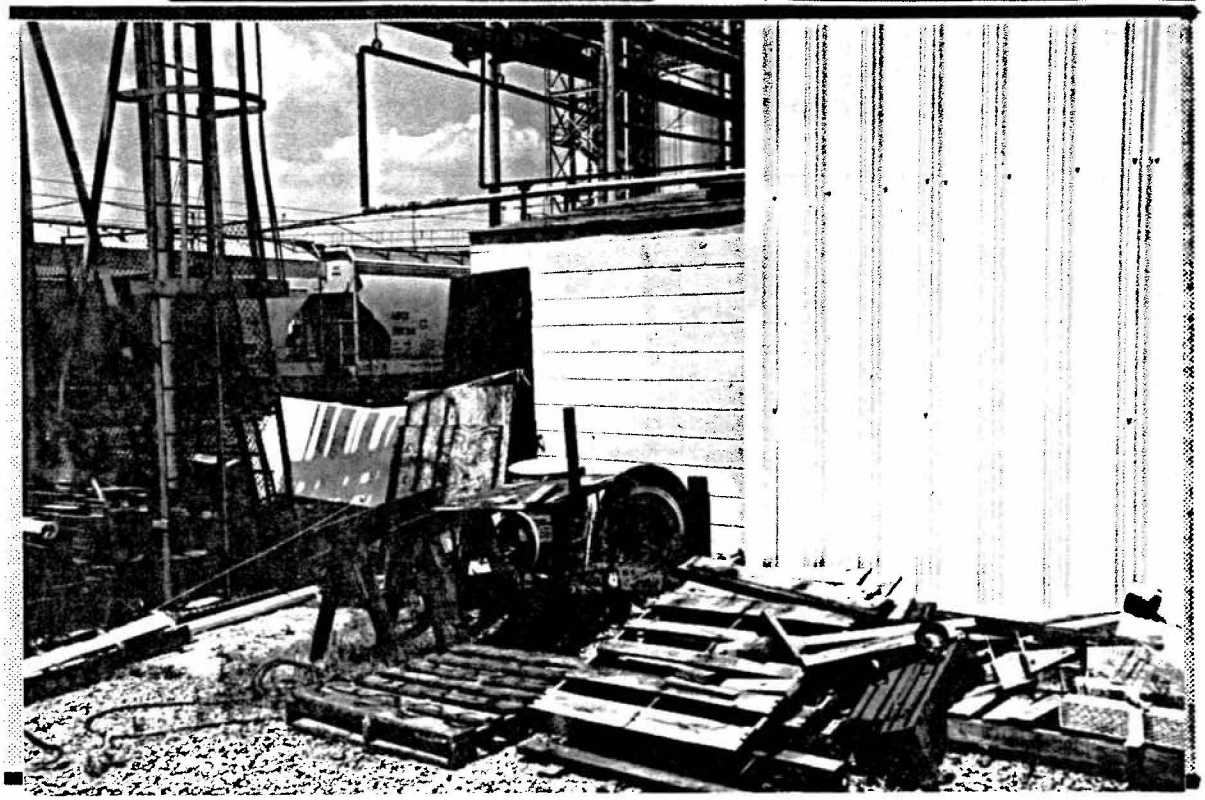


No. 27 **of** 31 **Description:** Well #3 (See Figure 6)
Photographer: S. White **Date:** 5-15-95 **Comment:**

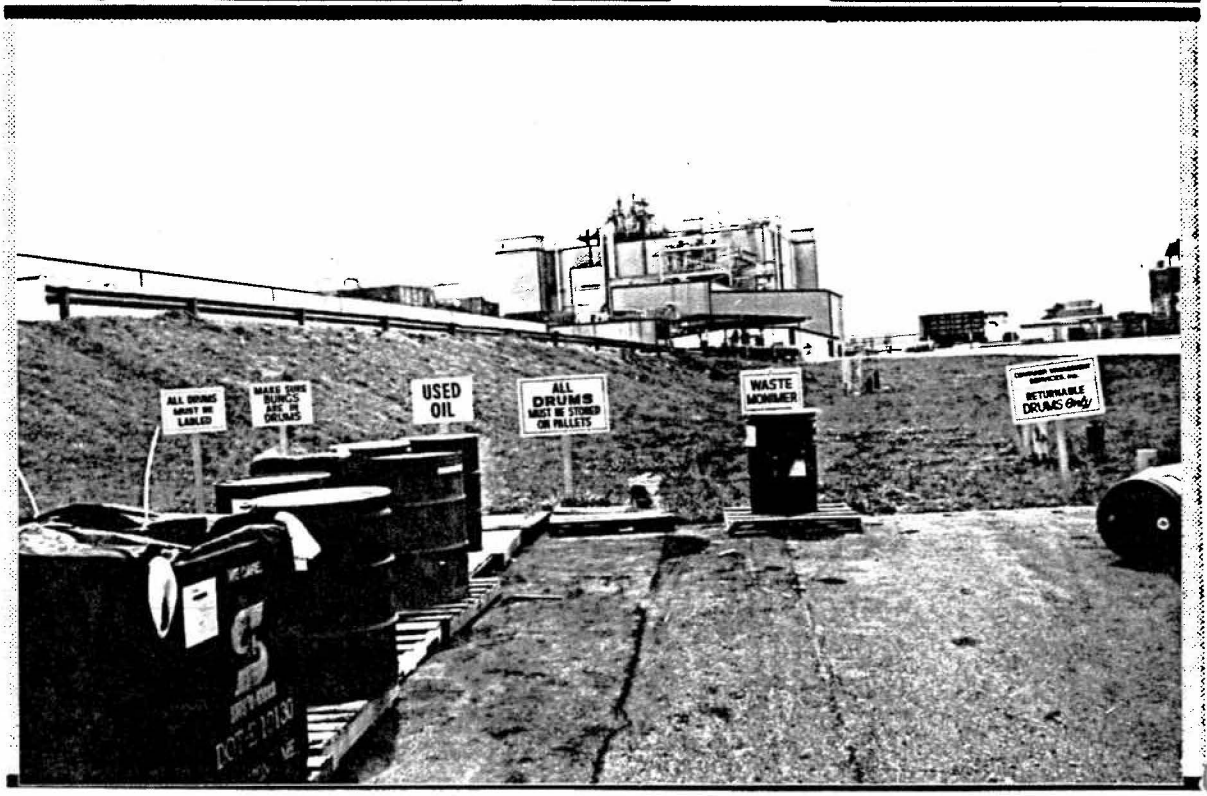
No. 28 **of** 31 **Description:** Well #4 (See Figure 6)
Photographer: S. White **Date:** 5-15-95 **Comment:**

PHOTOGRAPHIC DOCUMENTATION

Site Name: Hercules **County:** Newton



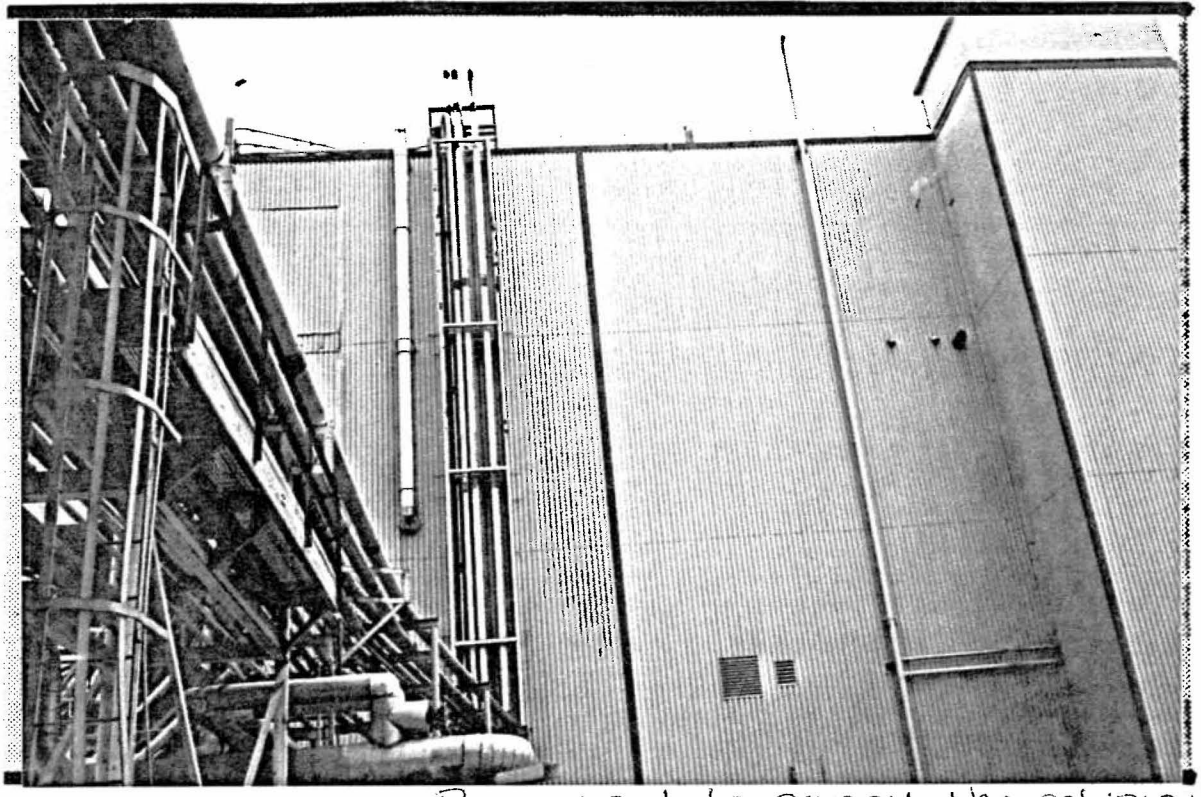
No. 29 **of** 31 **Description:** Well #1 (See figure 6)
Photographer: S. White **Date:** 5-15-95 **Comment:** There is no picture of W
#



No. 30 **of** 31 **Description:** New
Photographer: L. Akinaka **Date:** 5-16-95 **Comment:**

PHOTOGRAPHIC DOCUMENTATION

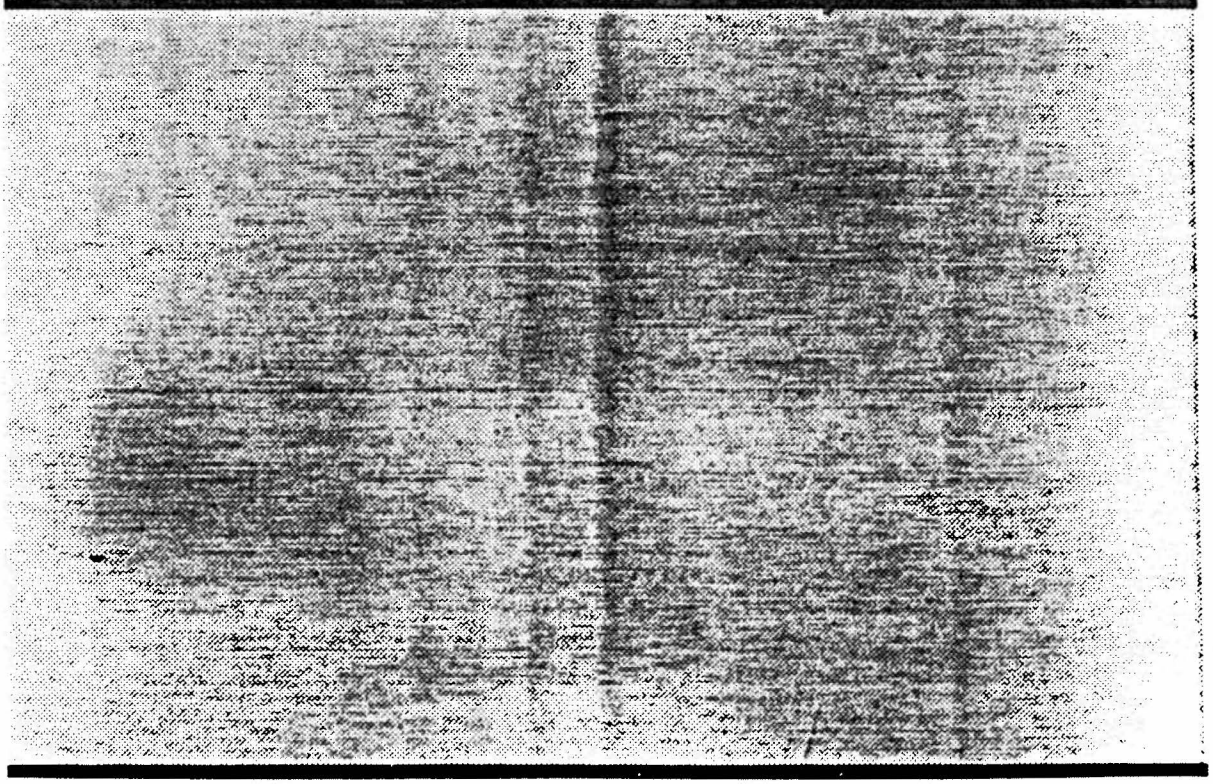
Site Name: Hercules **County:** Newton



Pipes used to carry the polyprotilie flakes to Plant I.

No. 31 **of** 31 **Description:**

Photographer: L. Ajanaku **Date:** 5-10-95 **Comment:**



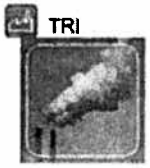
No.____ **of**____ **Description:**

Photographer:_____ **Date:**_____ **Comment:**

EPA United States Environmental Protection Agency

Envirofacts

Search Results



Envirofacts Report

<< Return

Query executed on JUN-18-2013
Results are based on data extracted on MAR-04-2013

TRI Links

- Overview
- TRI Tools
  - TRI Explorer
  - TRI Search
  - Form R Search
  - Form R & A Download
  - EZ Search
  - Customized Search
  - Pollution Prevention
  - Data Element Search Tool
- TRI Guides
  - TRI Explorer Guide
  - TRI Search Guide
  - Form R & A Download Guide
  - EZ Search Guide
  - Customized Search Guide
  - Pollution Prevention Guide
  - Operator Definition
  - Model
- Contact Us
- TRI Program Home
- RSEI Program Home

Report an Error

Click on "View Facility Information" to view EPA Facility information for the facility.

Facility Name:	HERCULES INC.	Mailing Name:	HERCULES INC.	
Address:	7101 ALCOVY RD. COVINGTON GA 30209	Mailing Address:	P.O. BOX 8OXFORD GA INVALID-	
County:	NEWTON	Region:	4	
Facility Information:	View Facility Information	TRI ID:	30209HRCLSALCOV	DUNS Number:

		FRS ID	110002316681
Latitude:	33.61151	Longitude:	-83.84979
Public Contact:	PATRICK R. KITCHENS	Phone:	4047867011
Parent Company:	HERCULES INC	Parent DUNS:	001315647

Starting with Reporting Year 2006, TRI Facilities began reporting NAICS codes, instead of SIC codes, to identify their Primary Business Activities.

NAICS Codes for 1994

NAICS CODE	PRIMARY	NAICS DESCRIPTION
325222	YES	Noncellulosic Organic Fiber Manufacturing

The above information comes from 1994, which was the last year NAICS code data was reported for this facility. The earliest NAICS code data on file for this facility was reported in 1988.

SIC Codes for 1994

SIC CODE	PRIMARY	SIC DESCRIPTION
2824	YES	ORGANIC FIBERS, NONCELLULOSIC

The above information comes from 1994, which was the last year SIC code data was reported for this facility. The earliest SIC code data on file for this facility was reported in 1987.

Map this facility

Map this facility using one of Envirofact's mapping utilities.

Besides TRI, this facility also does the following:

- has reported air releases under the Clean Air Act

More information about these additional regulatory aspects of this facility can be found by pressing the other regulatory data button below.

Other Regulatory Data

Total Aggregate Releases of TRI Chemicals to the Environment:

For all releases estimated as a range, the mid-point of the range was used in these calculations. This table summarizes the releases reported by the facility. ***NR*** *- signifies nothing reported by this facility for the corresponding medium.*

Total Aggregate Releases of TRI Chemicals excluding Dioxin and Dioxin-like Compounds
(Measured in Pounds)

Media	1994	1993	1992	1991	1990	1989	1988	1987
Air Emissions	NR	1950	774	4470	NR	0	0	NR
Surface Water Discharges	NR	NR	NR	NR	NR	NR	0	NR
Releases to Land	NR	NR	NR	NR	NR	NR	0	NR
Underground Injection	NR	NR	NR	NR	NR	NR	NR	NR
Total On-Site Releases	NR	1950	774	4470	NR	0	0	NR
Transfer Off-Site to Disposal	NR	NR	NR	NR	NR	19	2	NR
Total Releases	NR	1950	774	4470	NR	19	2	NR

Graphic Summary of this Table

Total Aggregate Releases of Dioxin and Dioxin-like Compounds
(Measured in Grams)

Media	1994	1993	1992	1991	1990	1989	1988	1987
Air Emissions	NR	NR	NR	NR	NR	NR	NR	NR
Surface Water Discharges	NR	NR	NR	NR	NR	NR	NR	NR
Releases to Land	NR	NR	NR	NR	NR	NR	NR	NR
Underground Injection	NR	NR	NR	NR	NR	NR	NR	NR
Total On-Site Releases	NR	NR	NR	NR	NR	NR	NR	NR

Transfer Off-Site to Disposal	NR	NR	NR	NR	NR	NR	NR	NR
Total Releases	NR	NR	NR	NR	NR	NR	NR	NR

TRI Chemicals Reported on Form A:

Please note that there were no chemicals reported on Form A for this facility

NOTE:

All chemicals reported below have release or transfer amounts greater than zero. To see a list of all chemicals reported by this facility click here.

Names and Amounts of Chemicals Released to the Environment by Year.

For all releases estimated as a range, the mid-point of the range was used in these calculations. ***NR*** *- signifies nothing reported for this facility by the corresponding medium. Rows with all "0" or "NR" values were not listed.*

Chemical Name	Media	Unit Of Measure	1994	1993	1992	1991	1990	1989	1988	1987
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	AIR STACK	Pounds	NR	0	449	170	NR	NR	NR	NR
COPPER COMPOUNDS (TRI Chemical ID: N100)	DISP METALS	Pounds	NR	NR	NR	NR	NR	4	NR	NR
COPPER COMPOUNDS (TRI Chemical ID: N100)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	9	NR	NR
COPPER COMPOUNDS (TRI Chemical ID: N100)	POTW METALS	Pounds	NR	NR	NR	NR	NR	6	NR	NR
SODIUM HYDROXIDE (SOLUTION) (TRI Chemical ID: 001310732)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	2	NR
TRICHLOROFLUOROMETHANE (TRI Chemical ID: 000075694)	AIR FUG	Pounds	NR	1950	325	4300	NR	NR	NR	NR

Discharge of Chemicals into Streams or Bodies of Water:

Please note that either there were no releases of chemicals into streams or bodies of water reported by this facility or the facility did not file a TRI form R for the years 1987 to 1994. Rows with Release Amount equal to "0" were not listed.

Transfer of Chemicals to Off-Site Locations other than POTWs:

For all releases estimated as a range, the mid-point of the range was used in these calculations. Rows with Total Transfer Amount equal to "0" were not listed.

Chemical Name	Year	Unit Of Measure	Total Transfer Amount	Transfer Site Name and Address	Type Of Waste Management
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1993	Pounds	193	**ALLWASTE RECOVERY SYSTEMS 8025 SPENCE RD. FAIRBURN, GA 30213**	Wastewater Treatment (Excluding POTW)
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1993	Pounds	10	**CONTAINER WASTE SERVICES 717 FLINT AVE. ALBANY, GA 30101**	Wastewater Treatment (Excluding POTW)
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1993	Pounds	463	**GEORGE A. GOULSTON INC. 700 N. JOHNSTON ST. MONROE, NC 28110**	Wastewater Treatment (Excluding POTW)
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1992	Pounds	83	**ALLWASTE RECOVERY SYSTEMS 8025 SPENCE RD. FAIRBURN, GA 30213**	Wastewater Treatment (Excluding POTW)
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1992	Pounds	1025	**CONTAINER WASTE SERVICES 717 FLINT AVE. ALBANY, GA 30101**	Wastewater Treatment (Excluding POTW)
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1992	Pounds	478	**GEORGE A. GOULSTON INC. 700 N. JOHNSTON ST. MONROE, NC 28110**	Wastewater Treatment (Excluding POTW)
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1991	Pounds	400	**CONTAINER WASTE SERVICES 717 FLINT AVE. ALBANY, GA 30101**	Wastewater Treatment (Excluding POTW)
CERTAIN GLYCOL ETHERS	1991	Pounds	5600	**LAIDLAW ENVIRONMENTAL SERVICES, OF**	Wastewater Treatment (Excluding

(TRI Chemical ID: N230)				**CHATTANOOGA INC. 3300 CUMMINGS RD. CHATTANOOGA, TN 37419**	POTW)
COPPER COMPOUNDS (TRI Chemical ID: N100)	1989	Pounds	4	**GSX HYDROTECH SYSTEMS INC. 318 WAUHATCHIE PIKE CHATTANOOGA, TN 37419**	Wastewater Treatment (Excluding POTW)
COPPER COMPOUNDS (TRI Chemical ID: N100)	1989	Pounds	9	**NEWTON COUNTY LANDFILL 205 LOWER RIVER RD. COVINGTON, GA 30209**	Landfill/Disposal Surface Impoundment
SODIUM HYDROXIDE (SOLUTION) (TRI Chemical ID: 001310732)	1988	Pounds	2	**NEWTON COUNTY LANDFILL 205 LOWER RIVER RD. COVINGTON, GA 30209**	Landfill/Disposal Surface Impoundment
TRICHLOROFLUOROMETHANE (TRI Chemical ID: 000075694)	1991	Pounds	80	**OHM RESOURCE RECOVERY CORPORAT, ION 5371 COOK RD. MORROW, GA 30260**	Transfer to Waste Broker-Energy Recovery

Summary of Waste Management Activities

Summary of Waste Management Activities excluding Dioxin and Dioxin-like Compounds
(Measured in Pounds)

This facility did not report any waste management activities for non Dioxin-like Compounds.

Summary of Waste Management Activities for Dioxin and Dioxin-like Compounds
(Measured in Grams)

This facility did not report any waste management activities for Dioxin and Dioxin-like Compounds.

Chemicals Under Waste Management:

This facility did not report any chemicals as being treated, recycled, or used in energy recovery.

Publicly Owned Treatment Works (POTW) that Chemicals were Transferred to in 2011 and after:

This facility did not transfer any chemicals to a Publicly Owned Treatment Works (POTW) in 2011 and after.

Publicly Owned Treatment Works (POTW) that Chemicals were Transferred to PRIOR to 2011:

Prior to reporting year 2011, TRI only required facilities to report a total for all transfers of a chemical to one or more POTWs. In cases where a facility transferred waste to more than one POTW, it was not possible to list the quantities transferred to the individual POTWS. Displayed below is the history of POTW transfers prior to 2011 showing the chemical, year and POTW Name and Address. For all releases estimated as a range, the mid-point of the range was used in these calculations. Rows with Total Transfer Amount equal to "0" were not listed.

Chemical Name	Year	Unit Of Measure	Total Transfer Amount
CERTAIN GLYCOL ETHERS	1991	Pounds	17000
CERTAIN GLYCOL ETHERS	1992	Pounds	27188
CERTAIN GLYCOL ETHERS	1993	Pounds	21186
COPPER COMPOUNDS	1989	Pounds	6
SODIUM HYDROXIDE (SOLUTION)	1988	Pounds	100

Chemical Name	Year	POTW Name and Address
CERTAIN GLYCOL ETHERS	1991	COVINGTON WASTE WATER TREATMEN, T FACILITY 10190 PUCKET STREET, S.W, COVINGTON, GA 30209
CERTAIN GLYCOL ETHERS	1992	COVINGTON WASTE WATER TREATMEN, T FACILITY 10190 PUCKETT STREET, SW COVINGTON, GA 30209
CERTAIN GLYCOL ETHERS	1993	COVINGTON WASTE WATER TREATMEN, T FACILITY 10190 PUCKETT STREET, SW COVINGTON, GA 30209
COPPER COMPOUNDS	1989	COVINGTON WASTEWATER TREATMENT, FACILITY 10190 PUCKET ST., S.W. COVINGTON, GA 30209
SODIUM HYDROXIDE (SOLUTION)	1988	COVINGTON WASTEWATER, TREATMENT FACILITY 10190 PUCKET ST. S.W.

		COVINGTON, GA 30209
SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	1987	NA
SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	1989	COVINGTON WASTEWATER TREATMENT, FACILITY 10190 PUCKET ST., S.W. COVINGTON, GA 30209
SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	1990	COVINGTON WASTEWATER, TREATMENT FACILITY 10190 PUCKET ST. S.W. COVINGTON, GA 30209
SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	1991	COVINGTON WASTE WATER TREATMEN, T FACILITY 10190 PUCKET STREET, S.W, COVINGTON, GA 30209
SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	1992	COVINGTON WASTE WATER TREATMEN, T FACILITY 10190 PUCKETT STREET, SW COVINGTON, GA 30209
SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	1993	COVINGTON WASTE WATER TREATMEN, T FACILITY 10190 PUCKETT STREET, SW COVINGTON, GA 30209
SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	1994	COVINGTON WASTE WATER TREATMEN, T FACILITY 10190 PUCKETT STREET, SW COVINGTON, GA 30209

Non Production Releases:

This facility did not report any Non-Production releases.

Additional Source Reduction and Pollution Prevention Data:

The P2 Report *summarizes chemical-specific Pollution Prevention (P2) data for multiple years, including Newly Implemented Source Reduction Activities (Section 8.10) and Optional Pollution Prevention Information (Section 8.11). A "P2 Data" data entry indicates that P2 data was reported for that specific chemical and year. A NR signifies that no Pollution Prevention data was reported for that specific chemical and year.*

View all P2 Information for this facility

Chemical Name	1991	1992	1993	P2 Report
CERTAIN GLYCOL ETHERS	P2 Data	NR	NR	P2 Report
TRICHLOROFLUOROMETHANE	NR	P2 Data	P2 Data	P2 Report

Additional links for TRI:

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EPA

Envirofacts

Search Results

Pollution Prevention

Facility ID: 30209HRCLSALCOV

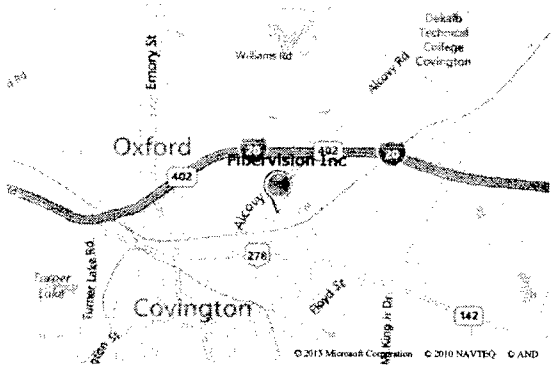
Facility Name and Address:
HERCULES INC.
7101 ALCOVY RD.
COVINGTON, GA 30209

Parent Company: HERCULES INC

Industry: Noncellulosic Organic Fiber Manufacturing (325222)
Chemical: Trichlorofluoromethane

Find more P2 activities for this industry and chemical
View TRI Form R submissions by this facility

Show P2 data for other chemicals at this facility:
Select a chemical



*You can navigate within the map with your mouse.

TRI Links

- Overview
- TRI Tools
  - TRI Explorer
  - TRI Search
  - Form R Search
  - Form R & A Download
  - EZ Search
  - Customized Search
  - Pollution Prevention
  - Data Element Search Tool
- TRI Guides
  - TRI Explorer Guide
  - TRI Search Guide
  - Form R & A Download Guide
  - EZ Search Guide
  - Customized Search Guide
  - Pollution Prevention Guide
  - Operator Definition
  - Model
- Contact Us
- TRI Program Home
- RSEI Program Home

Production Related Waste Management for Selected Chemical

For more on the Waste Management Hierarchy, see the Pollution Prevention Overview page

Management of Trichlorofluoromethane at Facility HERCULES INC.

Waste Management Comparison - Select Year: 1993

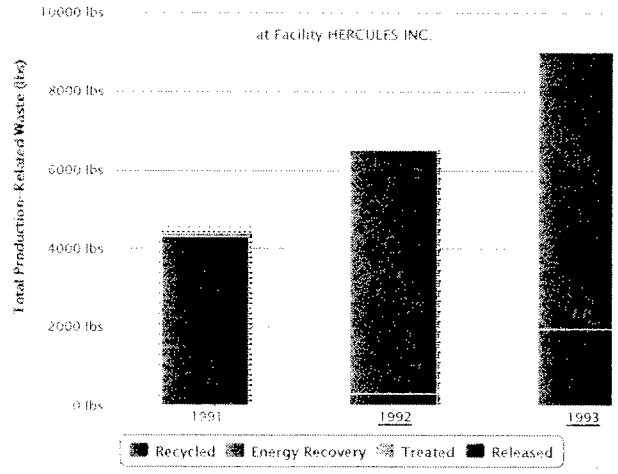


Chart Options:

- Display waste quantities only
  Display production index - **Valid production data are unavailable for this facility**
- Normalize waste quantities relative to production
  Display waste quantities as a percentage of total waste

Find more P2 activities for this industry and chemical

Pollution Prevention Activities for Selected Chemical

Print

Show 10 entries | Showing 1 to 2 of 2 entries | Search:

Reporting Year	Section 8.10: Newly Implemented Source Reduction Activity	Section 8.10: Methods to Identify Activity	Section 8.11: Optional Pollution Prevention Information

Reporting Year	Section 8.10: Methods Implemented Source Reduction Activity	Section 8.10: Methods to Identify Activity	Section 8.11: Optional Pollution Prevention Information
1993	W58 Other process modifications	T10: Vendor assistance	
1992	W58 Other process modifications	T10: Vendor assistance	

Showing 1 to 2 of 2 entries

EPA

Envirofacts

Search Results

Pollution Prevention

Facility ID: 30209HRCLSALCOV

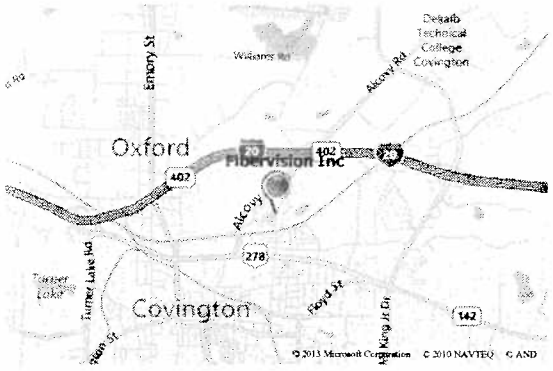
Facility Name and Address:
HERCULES INC.
7101 ALCOVY RD.
COVINGTON, GA 30209

Parent Company: HERCULES INC

Industry: Noncellulosic Organic Fiber Manufacturing (325222)
Chemical: Trichlorofluoromethane

Find more P2 activities for this industry and chemical
View TRI Form R submissions by this facility

Show P2 data for other chemicals at this facility:
Select a chemical



*You can navigate within the map with your mouse.

TRI Links

- Overview
- TRI Tools
  - TRI Explorer
  - TRI Search
  - Form R Search
  - Form R & A Download
  - EZ Search
  - Customized Search
  - Pollution Prevention
  - Data Element Search Tool
- TRI Guides
  - TRI Explorer Guide
  - TRI Search Guide
  - Form R & A Download Guide
  - EZ Search Guide
  - Customized Search Guide
  - Pollution Prevention Guide
  - Operator Definition
  - Model
- Contact Us
- TRI Program Home
- RSEI Program Home

Report an Error

Production Related Waste Management for Selected Chemical

For more on the Waste Management Hierarchy, see the Pollution Prevention Overview page

Management of Trichlorofluoromethane at Facility HERCULES INC.

Waste Management Comparison - Select Year: 1993

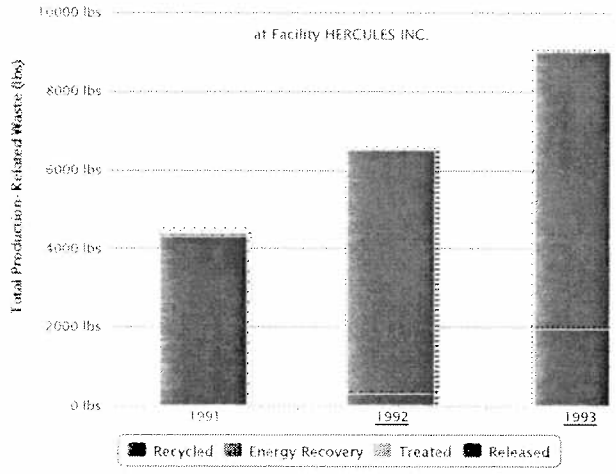


Chart Options:

- Display waste quantities only
- Display production index - **Valid production data are unavailable for this facility**
- Normalize waste quantities relative to production
- Display waste quantities as a percentage of total waste

Find more P2 activities for this industry and chemical

Pollution Prevention Activities for Selected Chemical

Print

Show 10 entries — Showing 1 to 2 of 2 entries — Search:

Reporting Year	Section 8.10: Newly Implemented Source Reduction Activity	Section 8.10: Methods to Identify Activity	Section 8.11: Optional Pollution Prevention Information

Reporting Year	Section 8.10: Implemented Source Reduction Activity	Section 8.10: Methods to Identify Activity	Section 8.11: Optional Pollution Prevention Information
1992	W58 Other process modifications	T10: Vendor assistance	

Showing 1 to 2 of 2 entries

Envirofacts

Search Results

AFS

Plant Information

FIBERVISIONS INCORPORATED
7101 ALCOVY RD
COVINGTON, GA 30014
EPA Plant ID: 110002316681

Operating Status:	O	HPV Flag:	
Operating Status Description:	OPERATING	State Registration Number:	M KEITH
State County Compliance Source:	1321700020	Government Facility Code Description:	PRIVATELY OWNED/OPERATED
Region Code:	04	Class Code:	A
Primary SIC Code:	2824	Class Code Description:	ACTUAL OR POTENTIAL EMISS
Primary SIC Description:	ORGANIC FIBERS, NONCELLUL	Compliance Status:	3
NAICS Code:	325222	Compliance Status Description:	IN COMPLIANCE - INSPECTIO
NAICS Code Description:	Noncellulosic Organic Fiber Manufacturing	Date Plant Information Last Updated:	02/28/2013

AFS Links

- Overview
- Search
- Model
- Law
- AFS Search User Guide
- Contact Us
- AFS Home

Report an Error

Links for This Facility

- Air Facility System
- EnviroMapper for Envirofacts
- MyEnvironment
- Facility Registry System
- Enforcement and Compliance History

Air Program Information

Air Program Code	Air Program Description	Air Program Status	Air Program Status Description	Air Program Subpart	Air Program Subpart Description	Class Code	Class Code Description	Compliance Status	Compliance Status Description
0	SIP	O	OPERATING			A	ACTUAL OR POTENTIAL EMISS	3	IN COMPLIANCE - INSPECTIO
9	NSPS	O	OPERATING			A	ACTUAL OR POTENTIAL EMISS	3	IN COMPLIANCE - INSPECTIO
V	TITLE V PERMITS	O	OPERATING			A	ACTUAL OR POTENTIAL EMISS	3	IN COMPLIANCE - INSPECTIO

Pollutant Data

Air Program Code	Pollutant Code / CAS Number	Pollutant / CAS Description	Attain Indicator	Attain Indicator Description	Pollutant Compliance Status	ES Pollutant Compliance Description	Pollutant Class Code	Pollutant Class Description

0	CO	CARBON MONOXIDE	A	ATTAINMENT AREA FOR A GIV	3	IN COMPLIANCE - INSPECTIO	A	ACTUAL OR POTENTIAL EMISS
0	NO2	NITROGEN DIOXIDE	A	ATTAINMENT AREA FOR A GIV	3	IN COMPLIANCE - INSPECTIO	A	ACTUAL OR POTENTIAL EMISS
0	OT	OTHER EMISSIONS OTHER THAN ROAD BASED	A	ATTAINMENT AREA FOR A GIV	3	IN COMPLIANCE - INSPECTIO	A	ACTUAL OR POTENTIAL EMISS
0	PT	TOTAL PARTICULATE MATTER	A	ATTAINMENT AREA FOR A GIV	3	IN COMPLIANCE - INSPECTIO	A	ACTUAL OR POTENTIAL EMISS
0	SO2	SULFUR DIOXIDE	A	ATTAINMENT AREA FOR A GIV	3	IN COMPLIANCE - INSPECTIO	A	ACTUAL OR POTENTIAL EMISS
9	OT	OTHER EMISSIONS OTHER THAN ROAD BASED	A	ATTAINMENT AREA FOR A GIV	3	IN COMPLIANCE - INSPECTIO	A	ACTUAL OR POTENTIAL EMISS
V	OT	OTHER EMISSIONS OTHER THAN ROAD BASED	A	ATTAINMENT AREA FOR A GIV	3	IN COMPLIANCE - INSPECTIO	A	ACTUAL OR POTENTIAL EMISS

Compliance Monitoring Strategy

CMS Start Date	FY2008 CMS Indicator	FY2008 CMS Indicator Description	FY2009 CMS Indicator	FY2009 CMS Indicator Description
28-OCT-08	A	TITLE V MAJOR	A	TITLE V MAJOR

Plant Actions

Action Number	Key Action Numbers	Air Program Codes	National Action Type	National Action Description	Action Type	Action Description	Date Achieved	Penalty Amount	Results Code	Results Code Description	Pollutant Code	Regional Data Element	Regional Data Element 16
90000		0			00	EPA ACT.>90000	04-MAR-11						
00094		0			36	NO PERMIT REQUIRED	25-FEB-13		01	ACTION ACHIEVED			
00094		9			36	NO PERMIT REQUIRED	25-FEB-13		01	ACTION ACHIEVED			
00094		V			36	NO PERMIT REQUIRED	25-FEB-13		01	ACTION ACHIEVED			
00093		0	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	04-OCT-12		01	ACTION ACHIEVED			
00093		9	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	04-OCT-12		01	ACTION ACHIEVED			
00093		V	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	04-OCT-12		01	ACTION ACHIEVED			
00092		0	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	20-AUG-12		01	ACTION ACHIEVED			
00092		9	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	20-AUG-12		01	ACTION ACHIEVED			
00092		V	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	20-AUG-12		01	ACTION ACHIEVED			
00091		0	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	14-MAY-12		21	COMPLIANCE			

00091		9	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	14-MAY-12		21	COMPLIANCE				
00091		V	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	14-MAY-12		21	COMPLIANCE				
00090		0	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CS	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	31-JAN-12							
00090		9	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CS	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	31-JAN-12							
00090		V	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CS	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	31-JAN-12							
00089		0	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	23-FEB-12		MC	IN COMPLIANCE				
00089		9	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	23-FEB-12		MC	IN COMPLIANCE				
00089		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	23-FEB-12		MC	IN COMPLIANCE				
00088		0	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	23-FEB-12		01	ACTION ACHIEVED				
00088		9	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	23-FEB-12		01	ACTION ACHIEVED				
00088		V	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	23-FEB-12		01	ACTION ACHIEVED				
00087		0	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	31-JAN-12		01	ACTION ACHIEVED				
00087		9	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	31-JAN-12		01	ACTION ACHIEVED				
00087		V	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	31-JAN-12		01	ACTION ACHIEVED				
00086		0	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	20-OCT-11		01	ACTION ACHIEVED				
00086		9	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	20-OCT-11		01	ACTION ACHIEVED				
00086		V	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	20-OCT-11		01	ACTION ACHIEVED				
00085		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	20-APR-10		01	ACTION ACHIEVED				
00085		9	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	20-APR-10		01	ACTION ACHIEVED				
00085		V	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	20-APR-10		01	ACTION ACHIEVED				
00084		0	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	24-MAY-11		21	COMPLIANCE				
00084		9	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	24-MAY-11		21	COMPLIANCE				
00084		V	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	24-MAY-11		21	COMPLIANCE				

00083		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	20-APR-11		01	ACTION ACHIEVED			
00083		9	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	20-APR-11		01	ACTION ACHIEVED			
00083		V	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	20-APR-11		01	ACTION ACHIEVED			
00082		0	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CS	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	31-JAN-11						
00082		9	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CS	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	31-JAN-11						
00082		V	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CS	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	31-JAN-11						
00081		0	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	29-MAR-11		MC	IN COMPLIANCE			
00081		9	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	29-MAR-11		MC	IN COMPLIANCE			
00081		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	29-MAR-11		MC	IN COMPLIANCE			
00080		0	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	31-JAN-11		01	ACTION ACHIEVED			
00080		9	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	31-JAN-11		01	ACTION ACHIEVED			
00080		V	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	31-JAN-11		01	ACTION ACHIEVED			
00079		0	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	29-JUL-10		21	COMPLIANCE			
00079		9	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	29-JUL-10		21	COMPLIANCE			
00079		V	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	29-JUL-10		21	COMPLIANCE			
00078		0	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	28-JAN-10		01	ACTION ACHIEVED			
00078		9	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	28-JAN-10		01	ACTION ACHIEVED			
00078		V	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	28-JAN-10		01	ACTION ACHIEVED			
00077		0	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CS	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	28-JAN-10						
00077		9	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CS	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	28-JAN-10						
00077		V	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CS	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	28-JAN-10						
00076		0	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	16-MAR-10		MC	IN COMPLIANCE			
00076		9	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	16-MAR-10		MC	IN COMPLIANCE			

00076		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	16-MAR-10		MC	IN COMPLIANCE	
00075		0	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00075		9	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00075		V	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00074		0	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00074		9	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00074		V	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00073		0	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00073		9	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00073		V	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00072		0	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00072		9	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00072		V	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00071		0	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00071		9	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00071		V	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00070		0	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00070		9	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00070		V	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	16-JUN-09		PP	STACK TEST PASSED	PM10
00069		0	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	25-FEB-09		01	ACTION ACHIEVED	
00069		9	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	25-FEB-09		01	ACTION ACHIEVED	
00069		V	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	25-FEB-09		01	ACTION ACHIEVED	
00068		0	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	24-MAY-05		PP	STACK TEST PASSED	

00068		9	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	24-MAY-05		PP	STACK TEST PASSED			
00068		V	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	24-MAY-05		PP	STACK TEST PASSED			
00067		0	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	24-MAY-05		PP	STACK TEST PASSED			
00067		9	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	24-MAY-05		PP	STACK TEST PASSED			
00067		V	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	24-MAY-05		PP	STACK TEST PASSED			
00066		0	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	24-MAY-05		PP	STACK TEST PASSED	VOC		
00066		9	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	24-MAY-05		PP	STACK TEST PASSED	VOC		
00066		V	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	24-MAY-05		PP	STACK TEST PASSED	VOC		
00065		0	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	24-MAY-05		PP	STACK TEST PASSED	VOC		
00065		9	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	24-MAY-05		PP	STACK TEST PASSED	VOC		
00065		V	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	24-MAY-05		PP	STACK TEST PASSED	VOC		
00064		0	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	29-JUL-04		PP	STACK TEST PASSED			
00064		9	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	29-JUL-04		PP	STACK TEST PASSED			
00064		V	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	29-JUL-04		PP	STACK TEST PASSED			
00063		0	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	29-JUL-04		PP	STACK TEST PASSED	VOC		
00063		9	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	29-JUL-04		PP	STACK TEST PASSED	VOC		
00063		V	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVD	TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	29-JUL-04		PP	STACK TEST PASSED	VOC		
00062		0	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	03-JUN-08		21	COMPLIANCE			
00062		9	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	03-JUN-08		21	COMPLIANCE			
00062		V	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	03-JUN-08		21	COMPLIANCE			
00061		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	20-MAY-08		01	ACTION ACHIEVED			
00061		9	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	20-MAY-08		01	ACTION ACHIEVED			
00061		V	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	20-MAY-08		01	ACTION ACHIEVED			

00060		0	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CS	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	13-FEB-08				
00060		9	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CS	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	13-FEB-08				
00060		V	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CS	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	13-FEB-08				
00059		0	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	12-MAR-08		MC	IN COMPLIANCE	
00059		9	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	12-MAR-08		MC	IN COMPLIANCE	
00059		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	12-MAR-08		MC	IN COMPLIANCE	
00058		0	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	27-AUG-07		21	COMPLIANCE	
00058		9	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	27-AUG-07		21	COMPLIANCE	
00058		V	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	27-AUG-07		21	COMPLIANCE	
00057		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	26-APR-07		01	ACTION ACHIEVED	
00057		9	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	26-APR-07		01	ACTION ACHIEVED	
00057		V	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	26-APR-07		01	ACTION ACHIEVED	
00055		0	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	13-FEB-07		MC	IN COMPLIANCE	
00055		9	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	13-FEB-07		MC	IN COMPLIANCE	
00055		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	13-FEB-07		MC	IN COMPLIANCE	
00054		0	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	29-NOV-06		01	ACTION ACHIEVED	
00054		9	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	29-NOV-06		01	ACTION ACHIEVED	
00054		V	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	29-NOV-06		01	ACTION ACHIEVED	
00053		0	PX	STATE/LOCAL PCE/OFF-SITE	PX	STATE CONDUCTED PCE/ OFF-SITE	07-NOV-05		01	ACTION ACHIEVED	
00053		9	PX	STATE/LOCAL PCE/OFF-SITE	PX	STATE CONDUCTED PCE/ OFF-SITE	07-NOV-05		01	ACTION ACHIEVED	
00053		V	PX	STATE/LOCAL PCE/OFF-SITE	PX	STATE CONDUCTED PCE/ OFF-SITE	07-NOV-05		01	ACTION ACHIEVED	
00052		0	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	29-SEP-06		21	COMPLIANCE	
00052		9	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	29-SEP-06		21	COMPLIANCE	

00052		V	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	29-SEP-06		21	COMPLIANCE		
00051		0	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	28-JUL-06		01	ACTION ACHIEVED		
00051		9	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	28-JUL-06		01	ACTION ACHIEVED		
00051		V	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	28-JUL-06		01	ACTION ACHIEVED		
00050		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	27-FEB-06		01	ACTION ACHIEVED		
00050		9	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	27-FEB-06		01	ACTION ACHIEVED		
00050		V	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	27-FEB-06		01	ACTION ACHIEVED		
00049		0	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	24-JAN-06		01	ACTION ACHIEVED		
00049		9	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	24-JAN-06		01	ACTION ACHIEVED		
00049		V	PX	STATE/LOCAL PCE/OFF-SITE	37	REPORT DUE-STATE	24-JAN-06		01	ACTION ACHIEVED		
00048		0	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	24-FEB-06		MC	IN COMPLIANCE		
00048		9	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	24-FEB-06		MC	IN COMPLIANCE		
00048		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	24-FEB-06		MC	IN COMPLIANCE		
00047		0			35	PERMIT AMENDED-STATE	27-JUN-06		01	ACTION ACHIEVED		
00047		9			35	PERMIT AMENDED-STATE	27-JUN-06		01	ACTION ACHIEVED		
00047		V			35	PERMIT AMENDED-STATE	27-JUN-06		01	ACTION ACHIEVED		
00046		0	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	24-FEB-06					
00046		9	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	24-FEB-06					
00046		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	24-FEB-06					
00045		0	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERTIFICATION DUE/RECVD BY EPA	24-JAN-06					
00045		9	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERTIFICATION DUE/RECVD BY EPA	24-JAN-06					
00045		V	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERTIFICATION DUE/RECVD BY EPA	24-JAN-06					
00044		0	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	10-FEB-05					NO DEVIATIONS REPORTED

00044		9	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	10-FEB-05					NO DEVIATIONS REPORTED
00044		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	10-FEB-05					NO DEVIATIONS REPORTED
00043		0	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERTIFICATION DUE/RECVD BY EPA	31-JAN-05					NO DEVIATIONS REPORTED
00043		9	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERTIFICATION DUE/RECVD BY EPA	31-JAN-05					NO DEVIATIONS REPORTED
00043		V	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERTIFICATION DUE/RECVD BY EPA	31-JAN-05					NO DEVIATIONS REPORTED
00042		0	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	30-SEP-05					
00042		9	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	30-SEP-05					
00042		V	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	30-SEP-05					
00041		0	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	30-SEP-04					
00041		9	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	30-SEP-04					
00041		V	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	30-SEP-04					
00040		V	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERTIFICATION DUE/RECVD BY EPA	02-FEB-04					
00039		0	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	14-APR-04	01	ACTION ACHIEVED			DEVIATIONS
00039		9	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	14-APR-04	01	ACTION ACHIEVED			DEVIATIONS
00039		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	14-APR-04	01	ACTION ACHIEVED			DEVIATIONS
00038		0	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	30-SEP-03	01	ACTION ACHIEVED			
00038		9	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	30-SEP-03	01	ACTION ACHIEVED			
00038		V	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	30-SEP-03	01	ACTION ACHIEVED			
00037		V	ER	COMPLIANCE CERTIFICATION EPA REVIEW	ER	TITLE V COMPLIANCE CERTIFICATION REVIEW BY EPA	31-JAN-03				Y	
00036		V	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERTIFICATION DUE/RECVD BY EPA	30-JAN-03				Y	
00035		0	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	10-FEB-03	01	ACTION ACHIEVED			NO DEVIATIONS REPORTED
00035		9	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	10-FEB-03	01	ACTION ACHIEVED			NO DEVIATIONS REPORTED
00035		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	10-FEB-03	01	ACTION ACHIEVED			NO DEVIATIONS REPORTED

00034		V	ER	COMPLIANCE CERTIFICATION EPA REVIEW	ER	TITLE V COMPLIANCE CERTIFICATION REVIEW BY EPA	04-FEB-02					N	
00033		V	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERTIFICATION DUE/RECVD BY EPA							
00032		0	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	30-SEP-02		01	ACTION ACHIEVED			
00032		9	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	30-SEP-02		01	ACTION ACHIEVED			
00032		V	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	FS	STATE CONDUCTED FCE/ ON-SITE	30-SEP-02		01	ACTION ACHIEVED			
00031		0			35	PERMIT AMENDED-STATE	19-JUN-02		01	ACTION ACHIEVED			
00030		0	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	05-MAR-02		01	ACTION ACHIEVED			NO DEVIATIONS REPORTED
00030		9	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	05-MAR-02		01	ACTION ACHIEVED			NO DEVIATIONS REPORTED
00030		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	05-MAR-02		01	ACTION ACHIEVED			NO DEVIATIONS REPORTED
00029		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	07-JUN-01		01	ACTION ACHIEVED			
00028		0			35	PERMIT AMENDED-STATE	15-NOV-00		01	ACTION ACHIEVED			
00027		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	20-JUL-00		01	ACTION ACHIEVED			
00026		0	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	10-MAY-00		97	APPROVED			
00025		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	08-JAN-98		01	ACTION ACHIEVED			
00024		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	04-JUN-99		01	ACTION ACHIEVED			
00023		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	17-JUL-97		01	ACTION ACHIEVED			
00022		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	27-SEP-96		01	ACTION ACHIEVED			
00021		0			00	MONITORING/	22-MAY-96		01	ACTION ACHIEVED		05	
00020		0			00	REGIONAL/NER	22-MAY-96		01	ACTION ACHIEVED		04	
00019		0			00	PERMITTING/MSP	22-MAY-96		01	ACTION ACHIEVED		03	
00018		0			00	PERMITTING/	22-MAY-96		01	ACTION ACHIEVED		02	
00017		0			00	COMPLIANCE/	22-MAY-96		01	ACTION ACHIEVED		01	
00016		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	09-AUG-93		01	ACTION ACHIEVED			
00015		0			35	PERMIT AMENDED-STATE	06-APR-92		01	ACTION			

										ACHIEVED			
00014		0			35	PERMIT AMENDED-STATE	26-JUL-91		01	ACTION ACHIEVED			
00013		0			A6	INSPECTION REPORT COMPLETED	24-JUL-91		01	ACTION ACHIEVED			
00012		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	07-FEB-91		21	COMPLIANCE			
00011		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	07-FEB-91		01	ACTION ACHIEVED			
00010		0	1A	EPA INSPECTION - LEVEL 2 OR GREATER	A4	INSPECTION - LEVEL 2 OR GREATER	07-FEB-91		01	ACTION ACHIEVED			
00009		0	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	14-SEP-90		01	ACTION ACHIEVED			
00008		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	27-JAN-89		01	ACTION ACHIEVED			
00007		0			35	PERMIT AMENDED-STATE	17-NOV-88		01	ACTION ACHIEVED			
00006		0			35	PERMIT AMENDED-STATE	01-OCT-87		01	ACTION ACHIEVED			
00005		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	20-AUG-87		01	ACTION ACHIEVED			
00004		0	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	03-APR-87		01	ACTION ACHIEVED			
00003		0	PS	STATE/LOCAL PCE/ON-SITE	27	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	29-AUG-86		01	ACTION ACHIEVED			
00002		0	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	13-MAY-86		01	ACTION ACHIEVED			
00001		0	7D	STATE/LOCAL PSD PERMIT ISSUED	33	STATE PERMIT ISSUED	13-MAR-86		01	ACTION ACHIEVED			

ress=&add_search_type=Beginning+With&city_name=&county_name=&state_code=&epa_region_code=&sic_code_desc=&sic_code=&all_programs=YES&chem_name=&chem_search=Beginning+With&cas_num=&program_search=1&report=1&page_no=1&output_sql_switch=TRUE&database_type=RCRAINFO

Envirofacts

Search Results

RCRAInfo

Data Disclaimer

Consolidated facility information (from multiple EPA systems) was searched to select facilities

EPA Facility ID: Beginning With: 110002316681

Results are based on data extracted on JUN-12-2013

Note: Click on the CORPORATE LINK value for links to that company's environmental web pages.

Click on the MAPPING INFO value to obtain mapping information for the facility.

The facility information data within the output below can be downloaded in a comma-seperated value file for use in Excel by clicking here:

Go To Bottom Of The Page

RCRAInfo Links

- Overview
- Search
- Model
- Law
- RCRAInfo Search User Guide
- Contact Us
- Office of Resource Conservation and Recovery Home

HANDLER NAME:	FIBERVISION INC	HANDLER ID:	GAD098583909
STREET:	7101 ALCOVY ROAD NORTHEAST	FACILITY INFORMATION:	View Facility Information
CITY:	COVINGTON	CORPORATE LINK:	No
STATE:	GA	COUNTY:	NEWTON
ZIP CODE:	30014-1373	MAPPING INFO:	MAP
EPA REGION:		RCRA Corrective Action:	
LATITUDE	33.61151	LONGITUDE	-83.84979

CONTACT INFORMATION

NAME	STREET	CITY	STATE	ZIP CODE	PHONE	TYPE OF CONTACT
ROGER A MOORE	7101 ALCOVY RD	COVINGTON	GA	30267	7707867011	Public
PATRICK KITCHENS	PO BOX 8	OXFORD	GA	30267	4047867011	Permit
PATRICK KITHCENS					4047867011, 220	Permit
ROGER A MOORE					7707867011, 3220	Permit
PATRICK R KITCHENS					4047867011, 3220	Permit
PATRICK R KITCHENS					4047867011, 220	Permit
ROGER A MOORE	7101 ALCOVY RD	COVINGTON	GA	30267	7707867011	Permit

LIST OF NAICS CODES AND DESCRIPTIONS

NAICS CODE	NAICS DESCRIPTION
325222	NONCELLULOSIC ORGANIC FIBER MANUFACTURING

Go To Top Of The Page

Total Number of Facilities Displayed: 1

Last updated on Tuesday June 25 2013

4WD-RCRA

Ms. Jennifer R. Kaduck, Chief
Hazardous Waste Management Branch
Georgia Environmental Protection Division
205 Butler Street, S.E., Suite 1154
Atlanta, Georgia 30334

SUBJ: Comments on the RCRA Facility Assessment (RFA) Report
Hercules, Incorporated/Oxford, Georgia
EPA I.D. No. GAD 098 583 909

Dear Ms. Kaduck:

For the last few years, the Environmental Protection Agency's (EPA) overview of Georgia's implementation of the RCRA Program has focused more on HSWA activities rather than base program activities. With that in mind, the staff of Region 4's RCRA Permitting Section (FL/GA Unit) has initiated periodic oversight reviews of certain HSWA corrective action documents including RFAs, RFI NOTIs, and the HSWA portion of the State RCRA Permit. It is hoped that the comments and dialogue generated by these reviews have been helpful to the State, and it is with that in mind that the enclosed comments are submitted. These comments may be utilized now to make modifications to the Hercules RFA or in the future for use on other similar documents.

Enclosed are general and specific comments on the Hercules RFA Report. If you have any questions or would like to discuss the comments, feel free to contact Ms. Kim Clifton of my staff at (404) 347-3555 ext. 6320.

Sincerely,

G. Alan Farmer
Chief, RCRA Branch
Waste Management Division

Enclosure

K. Clifton/kc:4WD-RCRA:6320/10/2/95/HERCULES

KC
CLIFTON
10-3-95

WILLIAMS
10/3/95

FARMER

COMMENTS ON THE HERCULES RFA REPORT
OXFORD, GEORGIA
EPA I.D. NO. GAD 098 583 909

GENERAL COMMENTS

1. The RFA Report should include SWMU Data Sheets. SWMU Data Sheets should include the following information: name of the unit, type of unit, period of operation, physical description and condition (including function and location), wastes and/or hazardous constituents managed, release pathways, history and/or evidence of releases, and recommendations.

2. A number of buildings, tanks, types of equipment are mentioned as being at the facility, yet the function of all these components is not clearly tied together. Perhaps, a process flow diagram would assist in piecing the details of this facility together (e.g., What is the purpose of the underground oil/water separator? How does it fit into the process? What unit or units did it serve? What did it store? With the limited information presented it is not possible to determine if it should have been identified as a SWMU).

SPECIFIC COMMENTS

1. Introduction (Page 1)

Paragraph 1 introduces the RFA, but instead of identifying the objective of the RFA, which you would expect to follow this opening statement, the objective of the RCRA Program is stated.

It may be helpful at this point to identify the stages of the RFA, such as: Preliminary File Review, Visual Site Investigation, Verification Sampling, and RFA Report.

2. (Page 2)

a. Line 2 states, "The mechanism by which corrective action is specified includes the RFA, for which the present document is the final report."

As part of the RFA, **preliminary determinations** are made regarding releases of concern and the need for further actions and interim measures or stabilization at the facility, corrective action is not specified here, but in the permit.

b. Line 4 states that the RCRA corrective action program for SWMUs consists of three phases. The highlighted words should be deleted.

c. Line 5 identifies the RFA phase of the RCRA corrective action program as follows:

The RCRA Facility Assessment (RFA) to identify releases or potential releases requiring further investigation.

A more accurate definition would be as follows: The RFA, to identify SWMU & AOCs and evaluate them for releases or potential releases to all media.

d. Line 7 identifies the purpose of the RFI phase being to fully characterize the extent of identified releases. This should say to fully characterize the **nature and** extent of identified releases.

e. Line 9 identifies the third phase as corrective measures selection and implementation, if required. **Should this say CMS study and implementation? To be consistent with the other two phases as identified above briefly describe this phase.**

3. Site Features (Page 4)

Paragraph 2 states that the Dowthern tanks are **self-contained.** Please explain what is meant by self-contained. Do you mean has secondary containment?

5. Regulatory History (Page 6)

The first paragraph states that Hercules was granted a permit on June 30, 1986. What type of permit was this? Was this a permit to store hazardous waste? Please be specific here.

6. RCRA Order (Page 6)

It states here that an Administrative Order was executed, briefly explain why the Administrative Order was executed.

7. CERCLA Activities (Page 7)

This paragraph states that Hercules is on the CERCLA list. What CERCLA list? Is this a State list or a Federal list? Please be more specific.

INDIVIDUAL SWMU ASSESSMENTS AND AOC DESCRIPTION

8. SWMU 1: Salt Pot Room (Page 8)

Describe the equipment contained in this room. Describe how the polymer is reclaimed. List the hazardous wastes and/or hazardous constituents managed here. Describe the present condition of the floor.

9. SWMU 2: Old Waste Oil Storage Area

This paragraph states that an inspection of this area was performed in 1985. When was this area first used? Within this paragraph, this area is described also as the "Waste Oil Drum Storage Area," so can EPA assume that waste oil was released or leaked from a number of drums stored in this area at some time during the operation of this facility? What are the dimensions of the area where drums were located and how large of an area was cleaned up? The waste oil that was stored in this area, where did it come from?

10. SWMU 3: Container Storage Building

a. The following information should be included, in addition to the information already stated in this paragraph: location of the unit, physical description and condition of the unit, specific hazardous wastes and/or hazardous constituents managed, release pathways, years of operation.

b. Paragraph 1 concludes with the statement that further investigation is needed in this area. If an RFI is recommended then this should be stated here.

11. SWMU 4: Number 6 Fuel Oil Storage Tank Area

See comment 10a and 10 b above.

12. SWMU 5: Present Waste Oil Storage Area

a. What were the dimensions of the pad?

b. See comment 10b.

13. Summary (Page 9)

a. The purpose of this report should be to identify SWMUs and/or AOCs and evaluate them for releases or potential releases to all media, to make preliminary determinations regarding releases of concern and the need for further actions and interim measures or stabilization at the facility, and to identify those SWMUs and/or AOCs that do

not pose a threat to human health or the environment at the time of the VSI.

b. Paragraph 2 states the following:

It has been determined that there are AOCs at the facility as a result of current and past operations. During the visual site inspection, there were five (5) SWMUs identified. Three (3) of those units will require further investigation, and two (2) will not.

No AOCs were identified anywhere in the RFA Report except as mentioned above. It appears that the author is using the acronym AOC in error. EPA defines an Area of Concern (AOC) as any area having a probable release of hazardous waste or hazardous constituents which is not from a solid waste management unit and is determined by the Regional Administrator to pose a current or potential threat to human health or the environment. The five units identified above are clearly SWMUs. EPD may want to revise this paragraph.

GA0177

LAND Longston

HERCULES

Hercules Incorporated
P. O. Box 8
Oxford, GA 30267
(404) 786-7011

February 10, 1989

Regional Administrator
Environmental Protection Agency Region IV
345 Courtland St., N.E.
Atlanta, GA 30365

RE: Soft Hammer Demonstration/Certification

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, Hercules Incorporated has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a)(2) for EPA waste code U211.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that recovery is the best practically available treatment.

The review of practically available treatment technologies included a consideration of 1) past treatment practices, 2) a cost ratio that compared the cost of treatment, shipment and disposed versus the cost of shipment and disposal, and finally 3) a treatment hierarchy that included recycling/recovery, destruction (incinerator) and immobilization (stabilization).

If any further information is required, please contact me at (404) 786-7011.

Patrick Kitchens

Patrick Kitchens

Enclosure

xc: B. Khaleghi - GA EPD
E. A. Ikenberry - 5160 N.W.
Chemical Waste Management, Inc.

5857F/1

SOFT HAMMER DEMONSTRATION

Waste Code U211

FACILITY OWNER	LOCATION	TREATMENT METHOD	TELEPHONE	CONTACT	DATE
1. Chemical Waste Management, Inc.	Emelle, AL	Recovery	(205) 652-9721	Carolyn Miller	02/09/89

HERCULES

Hercules Incorporated
P. O. Box 8
Oxford, GA 30267
(404) 786-7011

I CERTIFY UNDER PENALTY OF LAW THAT THE REQUIREMENTS OF 40 CFR 268.8(A)(1) HAVE BEEN MET AND THAT I HAVE CONTRACTED TO TREAT MY WASTE (OR WILL OTHERWISE PROVIDE TREATMENT) BY THE PRACTICALLY AVAILABLE TECHNOLOGY WHICH YIELDS THE GREATEST ENVIRONMENTAL BENEFIT, AS INDICATED IN MY DEMONSTRATION. I BELIEVE THAT THE INFORMATION SUBMITTED IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

PATRICK KITCHENS

PK/de
02/15/89
5866F

GA 0243

DL

GAD 078 583 909

HERCULES

Hercules Incorporated
P. O. Box 8
Oxford, GA 30267
(404) 786-7011

RECEIVED
EPA/REGION IV
89 OCT 26 AM
WASTE
COMPLIANCE SECTION

March 29, 1989

Regional Administrator
Environmental Protection Agency Region IV
345 Courtland St., N.E.
Atlanta, GA 30365

RE: Revised Soft Hammer Demonstration/Certification

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, Hercules Incorporated has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a)(2) for EPA waste code U210.

This demonstration reflects the discovery that recovery is not a practically available treatment as was indicated in the February 10, 1989 demonstration submitted to you. Based on new information, incineration is the best practically available treatment.

The review of practically available treatment technologies included a consideration of 1) past treatment practices, 2) a cost ratio that compared the cost of treatment, shipment and disposed versus the cost of shipment and disposal, and finally 3) a treatment hierarchy that included recycling/recovery, destruction (incinerator) and immobilization (stabilization).

Please replace the previously submitted soft hammer demonstration and certification with this revision.

If any further information is required, please contact me at (404) 786-7011.

Patrick Kitchens

Enclosure

xc: B. Khaleghi - GA EPD
E. A. Ikenberry - 5160 N.W.
Chemical Waste Management, Inc.

5857F/3

SOFT HAMMER DEMONSTRATION

Waste Code U210

FACILITY OWNER	LOCATION	TREATMENT METHOD	TELEPHONE	CONTACT	DATE
1. Chemical Waste Management, Inc.	Emelle, AL	Incineration	(205) 652-9721	Susan Stokes	03/29/89
2. Trade Waste Incineration	Sauget, IL	Incineration	(618) 271-2804	Terry Johnson	03/31/89
3. CWM Resource Recovery, Inc.	West Carrollton, OH	Incineration	(513) 859-6101	Tony Rose	03/31/89

REV. 3/31/89

5857F/4

HERCULES

Hercules Incorporated
P. O. Box 8
Oxford, GA 30267
(404) 786-7011

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PATRICK KITCHENS

PK/de
02/15/89
5866F

GA0179

HERCULES

Hercules Incorporated
P. O. Box 8
Oxford, GA 30267
(404) 786-7011

February 10, 1989

Regional Administrator
Environmental Protection Agency Region IV
345 Courtland St., N.E.
Atlanta, GA 30365

RE: Soft Hammer Demonstration/Certification

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, Hercules Incorporated has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a)(2) for EPA waste code U210.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that recovery is the best practically available treatment.

The review of practically available treatment technologies included a consideration of 1) past treatment practices, 2) a cost ratio that compared the cost of treatment, shipment and disposed versus the cost of shipment and disposal, and finally 3) a treatment hierarchy that included recycling/recovery, destruction (incinerator) and immobilization (stabilization).

If any further information is required, please contact me at (404) 786-7011.

Patrick Kitchens

Enclosure

xc: B. Khaleghi - GA EPD
E. A. Ikenberry - 5160 N.W.
Chemical Waste Management, Inc.

5857F/2

SOFT HAMMER DEMONSTRATION

Waste Code U210

FACILITY OWNER	LOCATION	TREATMENT METHOD	TELEPHONE	CONTACT	DATE
1. Chemical Waste Management, Inc.	Emelle, AL	Recovery	(205) 652-9721	Carolyn Miller	02/09/89

HERCULES

Hercules Incorporated
P. O. Box 8
Oxford, GA 30267
(404) 786-7011

I CERTIFY UNDER PENALTY OF LAW THAT THE REQUIREMENTS OF 40 CFR 268.8(A)(1) HAVE BEEN MET AND THAT I HAVE CONTRACTED TO TREAT MY WASTE (OR WILL OTHERWISE PROVIDE TREATMENT) BY THE PRACTICALLY AVAILABLE TECHNOLOGY WHICH YIELDS THE GREATEST ENVIRONMENTAL BENEFIT, AS INDICATED IN MY DEMONSTRATION. I BELIEVE THAT THE INFORMATION SUBMITTED IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

PATRICK KITCHENS

PK/de
02/15/89
5866F